

## Environmental Protection Agency Internet Information

### EPA Region 2

While Freedom of Information Act (FOIA) requests will be honored by directly writing to Region 2, EPA provides an increasing amount of environmental media information, and other Regional activities via Internet at <http://www.epa.gov>.

Region 2 has provided a FOIA Web site <http://www.epa.gov/region02/foia/> with several online databases from which the environmental information can be retrieved.

- **"Frequently FOIAed Files"** Web site <http://www.epa.gov/region2/foia/fff.htm> covers RCRA and many other media Programs. Through this Web site, you can learn about each media Program, associated databases, and special points of interest. In particular, the ability to "directly download" all of the most commonly requested Region 2 Export Files (.xls) and Reports (.pdf) - all compressed for quicker downloading.

EPA Region 2 has established a **list of contaminated facilities** that are a high priority for cleanup in New York, New Jersey, Puerto Rico and the U.S. Virgin Islands. You can view each facility fact sheet at <http://www.epa.gov/region2/waste/cleanup/sites/>

### EPA- Headquarters

- **Envirofacts Data Warehouse** Web site [http://www.epa.gov/enviro/index\\_java.html](http://www.epa.gov/enviro/index_java.html) is a one-stop source to the environmental information. This Web site provides access to several EPA databases with information about environmental activities that may affect air, water and land anywhere in the United States.
- **"Window to My Environment"** Web site <http://www.epa.gov/enviro/wme> is a powerful tool that provides a wide range of federal, state and local information about environmental conditions and futures in an area of your choice.
- **The Enforcement and Compliance History Online (ECHO)** Web site <http://www.epa.gov/echo/> provides a list of all inspections and enforcement under most of the environmental statutes.
- **Right-To-Know Network (RTK Net)**, a non-EPA Web site <http://www.rtk.net.org/> on-line query engine provides free access to numerous databases and resources on environment.
- **National Biennial RCRA Hazardous Waste Report** Web site <http://www.epa.gov/epaoswer/hazwaste/data/biennialreport/index.htm> provides documents and data on hazardous waste reports.
- **Conditionally Exempt Small Quantity Generators** Web site <http://www.epa.gov/osw/hazard/generation/cesgg.htm> provides information on Conditionally Exempt Small Quantity Generators.

# RCRAREp Handler Detail Report

Report run on: October 25, 2013 5:12 PM

Facility Information			
ID / Dist	Name / Location Address ...	County	Regulated Activity
NJD065827925	UNION TWP BD OF ED HANNAH CALDWELL SCH		
CENTRAL	1120 COMMERCE AVE		
	UNION NJ 07083-5000	UNION	
Other State Interests			
-State Not a generator, Verified			
Permitting/Closure Universes			
Permit Progress ( Storage )			
Corrective Action Universes			
Subject to Corrective Action			
TSDF Subject to CA only under Discretionary Authorities			
Sources Overwritten Prior to 2001 (before RCRA kept history for activity/address/contact)			
01/01/07	I State/EPA		
01/01/06	I State/EPA		
04/23/98	N Notification		
02/28/92	R 91 Biennial		
04/30/90	R 89 Biennial		
11/19/80	A Part A		
Extract Flag			
All data for this Handler is released to the Public (except any enforcement-sensitive CME data)			
Activity Location			
Handler Module Data for NJ State only			
Previous/Other Site Name			
02/28/92 91 Biennial	BEST FOODS RES. & ENG. CENTR		
04/30/90 89 Biennial	BEST FOOD RES. & ENG. CENTER		
Location Address			
01/01/07 State/EPA	1120 COMMERCE AVE		
	UNION	(NJ039)	
	UNION, NJ 070835000		
	State District: CENTRAL		
	Land Type: ()		
02/28/92 91 Biennial	1120 COMMERCE AVE.		
	UNION	(NJ039)	
	UNION, NJ 070830000		
	State District: CENTRAL		
	Land Type: U (U)		
04/30/90 89 Biennial	1120 COMMERCE AVENUE		
	UNION	(NJ039)	
	UNION, NJ 07083		
	State District: CENTRAL		
	Land Type: U (U)		
11/19/80 Part A	1120 COMMERCE AVE		
	UNION	(NJ039)	

# RCRAREp Handler Detail Report

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NJD065827925

## Location Address

UNION, NJ 070835000  
State District: CENTRAL  
Land Type: ()

## North American Industrial Classification (NAICS)

01/01/07 State/EPA 31142  
02/28/92 91 Biennial 31142  
04/30/90 89 Biennial 31142

31142 FRUIT AND VEGETABLE CANNING, PICKLING, AND DRYING

## Mailing Address

01/01/07 State/EPA 1120 COMMERCE AVE  
UNION, NJ 07083  
02/28/92 91 Biennial 1120 COMMERCE AVENUE  
UNION, NJ 070830000  
04/30/90 89 Biennial 1120 COMMERCE AVENUE  
UNION, NJ 07083  
11/19/80 Part A 1120 COMMERCE AVE  
UNION, NJ 07083

## Contact

04/23/98 Notification KAREN DUNN  
2369 MORRIS AVE  
UNION, NJ 07083  
Phone: (908)851-6406  
02/28/92 91 Biennial KEITH J CASEY  
Phone: (908)688-9000 281  
04/30/90 89 Biennial KEITH CASEY  
Phone: (201)688-9000 281

## Legal Owner/Operator of Site

01/01/07 State/EPA Current Owner from -  
UNION TWP BD OF ED (Municipal)  
2369 MORRIS AVE  
UNION, NJ 07083  
Phone: (908)851-6406  
Notes: This record created to coincide with EPA Mass Update for 01/  
01/2007 on Rundate: 06/11/2008  
01/01/07 State/EPA Current Operator from -  
BEST FOODS RES AND ENG CENTER (Private)  
1120 COMMERCE AVE  
OPERCITY, NJ 99999  
Phone: (201)688-9000  
Notes: This record created to coincide with EPA Mass Update for 01/  
01/2007 on Rundate: 06/11/2008  
04/23/98 Notification Current Owner from -  
UNION TWP BD OF ED (Municipal)

# RCRAREp Handler Detail Report

Report run on: October 25, 2013 5:12 PM

NJD065827925

## Legal Owner/Operator of Site

2369 MORRIS AVE  
UNION, NJ 07083  
Phone: (908)851-6406

11/19/80 Part A Current Operator from -  
BEST FOODS RES AND ENG CENTER (Private)  
1120 COMMERCE AVE  
OPERCITY, NJ 99999  
Phone: (201)688-9000

## Regulated Hazardous Waste Activities

01/01/07 State/EPA

Federal Not a Generator  
Said is not a TSD. Agency gets TSD from Permit Units in PMT Module.

01/01/06 State/EPA

Federal Not a Generator  
Said is not a TSD. Agency gets TSD from Permit Units in PMT Module.

04/23/98 Notification

Federal Small Quantity Generator  
Said is not a TSD. Agency gets TSD from Permit Units in PMT Module.

02/28/92 91 Biennial

Federal Large Quantity Generator  
Said is not a TSD. Agency gets TSD from Permit Units in PMT Module.

04/30/90 89 Biennial

Federal Large Quantity Generator  
Said is not a TSD. Agency gets TSD from Permit Units in PMT Module.

11/19/80 Part A

Federal Not a Generator  
Said is a TSD. Agency gets TSD from Permit Units in PMT Module.

## Waste Codes

04/23/98 Notification	D000	D001	D002	D003	D009	D011	F002	F003
	F005	P004	P012	P022	P031	P037	P051	P059
	P089	P094	P098	P105	P119	P120	U001	U002
	U003	U012	U019	U021	U031	U034	U044	U048
	U052	U056	U061	U069	U077	U081	U082	U084
	U091	U092	U108	U112	U117	U122	U123	U124
	U125	U127	U133	U134	U140	U144	U146	U151
	U154	U159	U161	U165	U174	U179	U180	U185
	U188	U196	U197	U201	U211	U213	U218	U219
	U220	U228	U239					
11/19/80 Part A	D001	D002	D003	F002	F003	F005	P022	

D000	DESCRIPTION
D001	IGNITABLE WASTE
D002	CORROSIVE WASTE
D003	REACTIVE WASTE
D009	MERCURY

# RCRARep Handler Detail Report

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NJD065827925

## Waste Codes

D011 SILVER

F002 THE FOLLOWING SPENT HALOGENATED SOLVENTS: TETRACHLOROETHYLENE, METHYLENE CHLORIDE, TRICHLOROETHYLENE, 1,1,1-TRICHLOROETHANE, CHLOROBENZENE, 1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE, ORTHO-DICHLOROBENZENE, TRICHLOROFLUOROMETHANE, AND 1,1,2, TRICHLOROETHANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F004, AND F005; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

F003 THE FOLLOWING SPENT NONHALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NONHALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NONHALOGENATED SOLVENTS, AND A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

F005 THE FOLLOWING SPENT NONHALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NONHALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

P004 1,4,5,8-DIMETHANONAPHTHALENE, 1,2,3,4,10,10-HEXACHLORO-1,4,4A,5,8,8A,-HEXAHYDRO-, (1ALPHA, 4ALPHA, 4ABETA, 5ALPHA, 8ALPHA, 8ABETA)- (OR) ALDRIN

P012 ARSENIC OXIDE AS2O3 (OR) ARSENIC TRIOXIDE

P022 CARBON DISULFIDE

P031 CYANOGEN (OR) ETHANEDINITRILE

P037 2,7:3,6-DIMETHANONAPHTH[2,3-B]OXIRENE, 3,4,5,6,9,9-HEXACHLORO-1A,2,2A,3,6,6A,7,7A-OCTAHYDRO-, (1AALPHA, 2BETA, 2AALPHA, 3BETA, 6BETA, 6AALPHA, 7BETA, 7AALPHA)- (OR) DIELDRIN

P051 2,7:3,6-DIMETHANONAPHTH[2,3-B]OXIRENE, 3,4,5,6,9,9-HEXACHLORO-1A,2,2A,3,6,6A,7,7A-OCTAHYDRO-, (1AALPHA, 2BETA, 2ABETA, 3ALPHA, 6ALPHA, 6ABETA, 7BETA, 7AALPHA)- & METABOLITES (OR) ENDRIN (OR) ENDRIN, & METABOLITES

P059 4,7-METHANO-1H-INDENE, 1,4,5,6,7,8,8-HEPTACHLORO-3A,4,7,7A-TETRAHYDRO- (OR) HEPTACHLOR

P089 PARATHION (OR) PHOSPHOROTHIOIC ACID, O,O-DIETHYL-O-(4-NITROPHENYL) ESTER

P094 PHORATE (OR) PHOSPHORODITHIOIC ACID, O,O-DIETHYL S-[(ETHYLTHIO)METHYL] ESTER

P098 POTASSIUM CYANIDE (OR) POTASSIUM CYANIDE K(CN)

P105 SODIUM AZIDE

P119 AMMONIUM VANADATE (OR) VANADIC ACID, AMMONIUM SALT

P120 VANADIUM OXIDE V2O5 (OR) VANADIUM PENTOXIDE

U001 ACETALDEHYDE (I) (OR) ETHANAL (I)

U002 2-PROPANONE (I) (OR) ACETONE (I)

U003 ACETONITRILE (I,T)

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NJD065827925

## Waste Codes

U012 ANILINE (I,T) (OR) BENZENAMINE (I,T)  
 U019 BENZENE (I,T)  
 U021 [1,1'-BIPHENYL]-4,4'-DIAMINE (OR) BENZIDINE  
 U031 1-BUTANOL (I) (OR) N-BUTYL ALCOHOL (I)  
 U034 ACETALDEHYDE, TRICHLORO- (OR) CHLORAL  
 U044 CHLOROFORM (OR) METHANE, TRICHLORO-  
 U048 O-CHLOROPHENOL (OR) PHENOL, 2-CHLORO-  
 U052 CRESOL (CRESYLIC ACID) (OR) PHENOL, METHYL-  
 U056 BENZENE, HEXAHYDRO- (I) (OR) CYCLOHEXANE (I)  
 U061 BENZENE, 1,1'-(2,2,2-TRICHLOROETHYLIDENE)BIS[4-CHLORO- (OR) DDT  
 U069 1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER (OR) DIBUTYL PHTHALATE  
 U077 ETHANE, 1,2-DICHLORO- (OR) ETHYLENE DICHLORIDE  
 U081 2,4-DICHLOROPHENOL (OR) PHENOL, 2,4-DICHLORO-  
 U082 2,6-DICHLOROPHENOL (OR) PHENOL, 2,6-DICHLORO-  
 U084 1,3-DICHLOROPROPENE (OR) 1-PROPENE, 1,3-DICHLORO-  
 U091 [1,1'-BIPHENYL]-4,4'-DIAMINE, 3,3'-DIMETHOXY- (OR) 3,3'-DIMETHOXYBENZIDINE  
 U092 DIMETHYLAMINE (I) (OR) METHANAMINE, N-METHYL- (I)  
 U108 1,4-DIETHYLENEOXIDE (OR) 1,4-DIOXANE  
 U112 ACETIC ACID, ETHYL ESTER (I) (OR) ETHYL ACETATE (I)  
 U117 ETHANE, 1,1'-OXYBIS- (I) (OR) ETHYL ETHER (I)  
 U122 FORMALDEHYDE  
 U123 FORMIC ACID (C,T)  
 U124 FURAN (I) (OR) FURFURAN (I)  
 U125 2-FURANCARBOXALDEHYDE (I) (OR) FURFURAL (I)  
 U127 BENZENE, HEXACHLORO- (OR) HEXACHLOROBENZENE  
 U133 HYDRAZINE (R,T)  
 U134 HYDROFLUORIC ACID (C,T) (OR) HYDROGEN FLUORIDE (C,T)  
 U140 1-PROPANOL, 2-METHYL- (I,T) (OR) ISOBUTYL ALCOHOL (I,T)  
 U144 ACETIC ACID, LEAD(2+) SALT (OR) LEAD ACETATE  
 U146 LEAD SUBACETATE (OR) LEAD, BIS(ACETATO-O)TETRAHYDROXYTRI-  
 U151 MERCURY  
 U154 METHANOL (I) (OR) METHYL ALCOHOL (I)  
 U159 2-BUTANONE (I,T) (OR) METHYL ETHYL KETONE (MEK) (I,T)  
 U161 4-METHYL-2-PENTANONE (I) (OR) METHYL ISOBUTYL KETONE (I) (OR) PENTANOL, 4-M  
 ETHYL-  
 U165 NAPHTHALENE  
 U174 ETHANAMINE, N-ETHYL-N-NITROSO- (OR) N-NITROSODIETHYLAMINE  
 U179 N-NITROSOPIPERIDINE (OR) PIPERIDINE, 1-NITROSO-  
 U180 N-NITROSOPYRROLIDINE (OR) PYRROLIDINE, 1-NITROSO-  
 U185 BENZENE, PENTACHLORONITRO- (OR) PENTACHLORONITROBENZENE (PCNB)  
 U188 PHENOL  
 U196 PYRIDINE  
 U197 2,5-CYCLOHEXADIENE-1,4-DIONE (OR) P-BENZOQUINONE  
 U201 1,3-BENZENEDIOL (OR) RESORCINOL  
 U211 CARBON TETRACHLORIDE (OR) METHANE, TETRACHLORO-  
 U213 FURAN, TETRAHYDRO- (I) (OR) TETRAHYDROFURAN (I)

# RCRARep Handler Detail Report

Report run on: October 25, 2013 5:12 PM

NJD065827925

## Waste Codes

U218 ETHANETHIOAMIDE (OR) THIOACETAMIDE  
U219 THIOUREA  
U220 BENZENE, METHYL- (OR) TOLUENE  
U228 ETHENE, TRICHLORO- (OR) TRICHLOROETHYLENE  
U239 BENZENE, DIMETHYL- (I,T) (OR) XYLENE (I)

## Certification

01/01/07 State/EPA BRS-MANIFEST MASS UPDATE  
Signed: 01/01/07  
01/01/06 State/EPA BRS CYCLES 2001 2003 2005 BRS 2001 2003 2005  
Signed: 01/01/06  
02/28/92 91 Biennial SECTION LEADER KEITH J CASEY  
Signed: 02/28/92  
04/30/90 89 Biennial SECTION LEADER KEITH CASEY  
Signed: 04/30/90

## Biennial Reports Included/Excluded in Reports

02/28/92 91 Biennial Site probably included in 1991 BR National report.  
04/30/90 89 Biennial Site probably included in 1989 BR National report.

# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: October 25, 2013 - 4:59 PM

Version 5.0

## User Selection Criteria

<b>Location:</b>	New Jersey, all activities	<b>Activity Location:</b>	None Chosen
<b>Handler ID:</b>	NJD065827925	<b>Group of IDs:</b>	None Chosen
<b>Handler Name:</b>			
<b>Handler Universe:</b>	All Facilities Regardless of Universe		
<b>Determined Date Range:</b>	From: 10/01/1980 To: 10/25/2013		
<b>Location County Code:</b>	None Chosen	<b>Evaluation Type:</b>	
<b>Location City:</b>		<b>Focus Area:</b>	
<b>Location Zip Code:</b>		<b>Violation Type:</b>	
<b>State District:</b>	None Chosen	<b>Display Code Descrip.:</b>	Yes
<b>Sort Order:</b>	Region, State, Handler Name	<b>Display Universes:</b>	Yes

## Results

Data meeting the criteria you selected follows.

Total Pages:5      Total Handlers:1

## Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

## Report Information

**Name:** cme\_foia.rtf  
**Developed by:** EPA Headquarters, Office of Enforcement and Compliance Assurance  
**Deployed:** June 2006  
**Last Updated:** May 2012  
**Contact:** rcrainfo.help@epa.gov  
**Tables Used:** cmecomp3, cctation3, hreport\_univ5, lu\_citation, lu\_state, hid\_groups  
**Libraries:** none



# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: October 25, 2013 - 4:59 PM

## UNION TWP BD OF ED HANNAH CALDWELL SCH

County Name / Code: UNION / NJ039

NJD065827925

REGION 02

Location: 1120 COMMERCE AVE, UNION, NJ 07083-5000

Mailing: 1120 COMMERCE AVE, UNION, NJ 07083

Activity Location:	NJ	State District:	CENTRAL	Accessibility:	Non-Notifier:	Extract Flag:	Y	Active Site:	N
Generator:	N	Transporter:	N	Operating TSDF:	-----	IC In Place:	N	El Indicator (HE / GW)/N / N	-----
Short-Term Gen:	N	Transfer Facility:	N	Offsite Receiver:	N	HSM:	N	Subpart K:	-----
Full Enforcement:	-----	Converter:	-----	State Unaddressed SNC:	N	EPA Unaddressed SNC:	N		
CA Wkld:	N	State TSDF:	-----	State Addressed SNC:	N	EPA Addressed SNC:	N		
Active State Gen:	N			State SNC w/Comp Sched:	N	EPA SNC w/Comp Sched:	N		

**Violation:** Activity Location: NJ Type: 262.A Determined Date: 01/23/1986 Actual Compliance Date: 08/07/1987 Determined by Agency: State Responsible Agency: State  
Scheduled Compliance Date: 11/05/1986 Actual Compliance Date: 08/07/1987 RTC Qualifier: OBSERVED Sequence Number: 2

**CEI Evaluation** 01/23/1986 Activity Location: NJ By: State Identifier: 004 Person: R2DEP Branch: Found Violation: YES  
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

**Enforcement:** Activity Location: NJ Type: 310 Action Date: 10/16/1986 Responsible Person: R2DEP Identifier: 002  
Docket: Agency: State Action Date: 01/23/1986 Responsible Person: R2DEP Branch: Appeal Resolved:

Penalty Information: Proposed: \$5,375 Final Monetary: \$5,375 Collected: Total Final: \$5,375  
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:  
**Enforcement:** Activity Location: NJ Type: 120 Agency: State Action Date: 01/23/1986 Identifier: 003  
Docket: Agency: State Responsible Person: R2DEP Branch: Appeal Resolved:  
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

**Violation:** Activity Location: NJ Type: 262.A Determined Date: 01/23/1986 Actual Compliance Date: 12/08/1988 Determined by Agency: State Responsible Agency: State  
Scheduled Compliance Date: Actual Compliance Date: 12/08/1988 RTC Qualifier: UNVERIFIABLE Sequence Number: 3

**CEI Evaluation** 01/23/1986 Activity Location: NJ By: State Identifier: 004 Person: R2DEP Branch: Found Violation: YES  
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

### No Linked Enforcements

**Violation:** Activity Location: NJ Type: 262.A Determined Date: 09/20/1985 Actual Compliance Date: 04/04/1987 Determined by Agency: EPA Responsible Agency: EPA  
Scheduled Compliance Date: 10/20/1985 Actual Compliance Date: 04/04/1987 RTC Qualifier: OBSERVED Sequence Number: 5001

**NRR Evaluation** 09/20/1985 Activity Location: NJ By: EPA Oversight Identifier: 003 Person: Branch: Found Violation: YES  
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

**Enforcement:** Activity Location: NJ Type: 210 Action Date: 09/20/1985 Responsible Person: R2SIE Identifier: 001  
Docket: Agency: EPA Action Date: 09/20/1985 Responsible Person: R2SIE Branch: Appeal Resolved:  
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

\* Note: Penalty amount may not reflect all violations cited.

# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: October 25, 2013 - 4:59 PM

## UNION TWP BD OF ED HANNAH CALDWELL SCH, NJD065827925, UNION, NJ, continued -

### Evaluations With No Violations:

<b>CDI Evaluation</b>	07/11/1994	Activity Location: NJ	By: State	Identifier: 000	Person: NJBA	Branch: M	Found Violation: U
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>CEI Evaluation</b>	12/08/1988	Activity Location: NJ	By: State	Identifier: 008	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>NRR Evaluation</b>	07/07/1988	Activity Location: NJ	By: State	Identifier: 007	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>NRR Evaluation</b>	03/09/1988	Activity Location: NJ	By: State	Identifier: 006	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>NRR Evaluation</b>	04/17/1986	Activity Location: NJ	By: State	Identifier: 005	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>NRR Evaluation</b>	07/31/1984	Activity Location: NJ	By: State	Identifier: 002	Person:	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>NRR Evaluation</b>	03/07/1984	Activity Location: NJ	By: State	Identifier: 001	Person:	Branch:	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

**Total Number of Handlers:**

1

**Total Number of Activity Locations:**

1

\* End of Report \*

\* Note: Penalty amount may not reflect all violations cited.

# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: October 25, 2013 - 4:59 PM

## Description of codes used on the report:

Universes	Description of Universes
<b>Generator</b>	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
<b>Transporter</b>	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
<b>Operating TSDF</b>	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
<b>IC in Place</b>	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
<b>EI Indicator (HE / GW)</b>	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
<b>Short-Term Gen Transfer Facility</b>	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
<b>Offsite Receiver</b>	Indicates that the facility transfers hazardous waste.
<b>HSM</b>	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID). Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
<b>Subpart K</b>	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
<b>Full Enforcement</b>	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
<b>CA Workload</b>	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
<b>Active State Gen Converter</b>	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
<b>State TSDF</b>	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
<b>State Unaddressed SNC</b>	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
<b>State Addressed SNC</b>	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
<b>State SNC w/ Compl. Sched</b>	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
<b>EPA Unaddressed SNC</b>	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
<b>EPA Addressed SNC</b>	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
<b>EPA SNC w/ Compl. Sched</b>	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

\* Note: Penalty amount may not reflect all violations cited.

# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: October 25, 2013 - 4:59 PM

## Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

**NON-NOTIFIER** - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:

Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
CDI	CASE DEVELOPMENT INSPECTION
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
NRR	NON-FINANCIAL RECORD REVIEW

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL
210	INITIAL 3008(A) COMPLIANCE
310	FINAL 3008(A) COMPLIANCE ORDER

\* Note: Penalty amount may not reflect all violations cited.

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

BEST FOODS ENGINEERING & RES.

EPA SITE NUMBER: NJD065827925

UNION, NJ

SCORED BY: ROB SAVILL

OF CDM FEDERAL

ORIGINAL RANKING: 11/01/93 LAST RANKING: 11/01/93

GROUNDWATER SCORE	:	30.59
SURFACE WATER SCORE:		18.24
AIR ROUTE SCORE	:	0.00
ONSITE SCORE	:	3.43
-----		
MIGRATION SCORE	:	17.89

*Low*

*3/9/94 Jim RCR/S*

EPA ID NO. : NJD065827925  
BEST FOODS ENGINEERING & RES.

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? P

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : 15

NET PRECIPITATION (IN.) : 15

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CARBON TETRACHLORIDE

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0  
DRUMS : 0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 1.2

EPA ID NO. : NJD065827925  
BEST FOODS ENGINEERING & RES.

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N

IS THERE A PERMITTED OUTFALL? N

HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER

24-HOUR RAINFALL: 2.5

DISTANCE TO SURFACE WATER (MILES): 0.15

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CARBON TETRACHLORIDE

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:	0	
DRUMS	:	0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.2

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.4

EPA ID NO. : NJD065827925  
BEST FOODS ENGINEERING & RES.

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? N

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: VERY GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CARBON TETRACHLORIDE

TOXICITY/PERSISTENCE VALUE: 3

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS:	0
DRUMS :	5

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.4



EPA ID NO. : NJD065827925  
BEST FOODS ENGINEERING & RES.

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: LIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CARBON TETRACHLORIDE

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.20

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR BEST FOODS ENGINEERING AND RESEARCH  
UNION TOWNSHIP, NEW JERSEY

EPA SITE NUMBER: NJD065827925

SCORED BY: JAMES ROMIG  
OF CDM FEDERAL  
ON OCTOBER 28, 1993

GROUNDWATER SCORE :

SURFACE WATER SCORE:

AIR ROUTE SCORE :

ONSITE SCORE :

-----

MIGRATION SCORE :

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? *▲ POSSIBLE RELEASE*: UNDERGROUND HOLDING TANK  
ON SOUTH SIDE OF SOLVENT HOUSE IS OF UNKNOWN INTEGRITY (REF I; PART II; ITEM 1)

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : 15' (REF I; PART II; ITEM 4)

NET PRECIPITATION (IN.) : 15" (REF I; PART II; ITEM 6)

PHYSICAL STATE: LIQUID AND SOLID (REF I; PART II; ITEM 4)

CONTAINMENT: DRUM STORAGE AREA: *UNSAT* CONTAINMENT: *GOOD* (REF I; PART II; ITEM 6)  
UST *NO* INFO RE: TANK *GOOD* INTEGRITY: *GOOD* (REF I; PART II; ITEM 6)

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CARBON TETRACHLORIDE (REF I; PART II; ITEM 5)  
*II*

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? *NO*

CUBIC YARDS OR TONS:  
DRUMS

: *Likely to be Large  
based on dimensions of  
Storage house. (Ref I; Part II;  
Item 2)*

TARGETS

GROUNDWATER USE: DRINKING WATER (REF I; PART II; ITEM 10)

DISTANCE TO WELL (MILES): *1.2* MILES (REF I; PART II; ITEM 7)

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? No (REF 1; PART IV; ITEM 11)

IS THERE A PERMITTED OUTFALL? No (REF 1; PART IV; ITEM 10)

HAVE THERE BEEN PERMIT VIOLATIONS? No PERMIT

ROUTE CHARACTERISTICS

FACILITY LOCATION: OUTSIDE 500-YR FLOODPLAIN (REF 1; PART IV; ITEM 14)

24-HOUR RAINFALL: 2.5 (REF 2; MAP OF 1-YEAR 24 HOUR RAINFALL)

DISTANCE TO SURFACE WATER (MILES): 0.15 MILES (REF 1; PART IV; ITEM 13)

PHYSICAL STATE: LIQUID AND SOLID (REF 1; PART II; ITEM 4)

CONTAINMENT: SEE WS-1 GROUNDWATER ROUTE

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CARBON TETRACHLORIDE (REF 1; PART II; ITEM 5)

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? No

CUBIC YARDS OR TONS: Likely to be large based on  
DRUMS : dimensions of Solvent House  
(Ref 1; Part II; Item 2)

TARGETS

SURFACE WATER USE: NOT DRINKING WATER (REF 1; PART IV; ITEM 18): ASSUME  
RECREATIONAL

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.15 MILES (REF 1; PART IV; ITEM 13)

DISTANCE TO SENSITIVE ENVIRONMENT (MILES):  $\frac{1}{2}$  MILE (REF 1; PART IV; ITEM 25)

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? NO (REF I; PART II; ITEM 23)

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? NO (REF I; PART II; ITEM 10)

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS?  
NO PERMIT; NO INFO ON CITIZEN COMPLAINTS ∴ NO

CAN CONTAMINANTS MIGRATE INTO AIR? YES

CONTAINMENT: VERY GOOD (REF I; PART II; ITEM 6)  
(Sealed Containers / Indicators)

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CARBON TETRACHLORIDE (REF I; PART II; ITEM 5)

TOXICITY/PERSISTENCE VALUE: 3

QUANTITY KNOWN? Y

CUBIC YARDS OR TONS:  
DRUMS

: 4 + 10-5 GALL BUCKETS = 5 (REF I; PART II; ITEM 3)

TARGETS

POPULATION: RESIDENCES WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): < 1/2 MILE (REF I; PART II; ITEM 25)

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: NO INFO.; ASSUME LIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? NO. EXISTING DATA  
(REF I; PART II; EXISTING ANALYTICAL DATA)

CONTAINMENT: SEE WS-1 GROUNDWATER

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CARBON TETRACHLORIDE (REF I; PART II; ITEM 5)

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES):  $< 1/4$  (REF I; PART IV; ITEM 20)

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: NO (REF I; PART IV; ITEM 22)

## REFERENCES

- 1- EBASCO SERVICES, INC., ENVIRONMENTAL PRIORITIES INITIATIVE / PRELIMINARY ASSESSMENT FOR BEST FOODS ENGINEERING AND RESEARCH IN UNION TOWNSHIP, UNION COUNTY, NEW JERSEY, SEPTEMBER 1992.
- 2- U.S. ENVIRONMENTAL PROTECTION AGENCY, UNCONTROLLED HAZARDOUS WASTE SITE RANKING SYSTEM, AUGUST, 1982.

H

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF HAZARDOUS WASTE MANAGEMENT  
HAZARDOUS WASTE INSPECTION REPORT

20-19-03

DWM-029

## GENERATOR INSPECTION REPORT

## FACILITY INFORMATION

FACILITY NAME: Best Foods Research + EngineeringFILE NUMBER: 20-19-03

VHT FACILITY FILE NUMBER: \_\_\_\_\_

PERMIT #: \_\_\_\_\_

REGION: MINSPECTION DATE: 12/8/88

INCIDENT/CASE NUMBER: \_\_\_\_\_

INSPECTION TYPE: RCRA-GenRESPONSIBLE AGENCY CODE: SINSPECTOR'S NAME: Chris FeliceTTiINSPECTOR'S AGENCY: NJDEP-DHMMINSPECTOR'S BUREAU: BFO-MEPA ID NUMBER: NJD 065827925

ADDRESS:

1120 Commerce Rd. AveUnion, N.J. 07083LOT: 1 BLOCK: 4304COUNTY: UnionFACILITY PERSONNEL: Keith CaseyTELEPHONE #: 201-688-9000

OTHER STATE/EPA PERSONNEL: \_\_\_\_\_

REPORT PREPARED BY: Chris FeliceTTiREVIEWED BY: DE StirlingDATE OF REVIEW: 12/16/88



TIME IN: 1330

TIME OUT: 1530

PHOTOS TAKEN ☐ YES ☒ NO

SAMPLE TAKEN ☐ YES ☒ NO

IF YES, HOW MANY?           

NO. OF SAMPLES           

NJDEP SAMPLE ID#:           

MANIFESTS REVIEWED ☒ YES ☐ NO

Number of manifests in compliance 9

Number of manifests not in compliance           

List manifest document numbers of those manifests not in compliance.

-A1-

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS:

On 12/8/88 I conducted a RCRA inspection at Best Foods - Research and Engineering Division in Union, N.J. The facility representative was Mr. Keith Casey, Section Leader for Process Development.

Best Foods business is the development of new food products and the testing of existing food products. They are a division of CPC International Inc, Best Foods being the North American distribution center for this company. The developing and testing of foods is all done here and not in house products as CPC owns several brand names such as Muller's (macaroni products), Shippy (peanut butter) and Helman's (mayonnais).

Raw materials run the gamut from wheat, eggs, and peanuts for the foods, to solvents (methanol; acetone etc), acids, bases and other chemicals for the lab. Wastes generated at this site are from the laboratory work on testing and analyzing the foods. These are spent solvents, from extraction processes, and acids and bases from digestion reactions.

-A2-

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS (continued):

There are four types of labs, and a pilot plant that make up the process areas. The first step is the food product development ~~lab~~ labs - there ~~are~~ <sup>are</sup> a cross between a kitchen and a science lab. Food ingredients and flavorings are mixed together here on "bench-top" scale to design and develop the new food products. When a new product is developed it is then sent to the analytical chemistry department. Here the food is analysed for parameters like percent fat, percent moisture, and percent protein. This is ~~more~~ important, as some foods are defined by law, i.e. peanut butter is defined as a product that is 95% peanuts, etc. Tests used include a solvent extraction using various solvents for fats and oils, and a protein digestion, where the product is digested in sulfuric acid, then neutralized with sodium hydroxide for the analysis. This ~~area~~ <sup>also</sup> generates ~~most~~ <sup>bill</sup> of the waste. Existing food products are also tested. The third lab is the microbiology lab. Here they test for susceptibility to various

-A3-

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS (continued):

contaminations such as fungus or mold, and inoculations of ~~bacteria~~ bacteria. Things tested for are amount of contamination per amount of exposure or time needed to become contaminated. All samples from this lab are autoclaved (heated at high temperatures) to remove all ~~activities~~ active life and handled as solid waste. No hazardous waste comes from this area.

The final lab area is the packaging laboratory. Here they design and test packaging from ~~laboratories~~ aluminum foil, to plastic wraps, to boxes of paper or cardboard. The main goal is to develop the most cost efficient packaging, minimizing materials but maximizing protection of the product.

Once a product has been developed in the labs, if it proves to be adequate in the analytical and microbiological labs, it gets tried out in the pilot plant. This is a small scale portable plant operation. All equipment is transportable and is connected in the proper sequence to produce the new product.

-11-

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS (continued):

This produces in a larger scale than is available in the bench-top process. The product is then re-analyzed and tested to be sure it meets the standards. If successful, it moves to the "sensory lab". This is the "taste test" part of the development stage. Professional tasters as well as off-the-street consumers are brought in to provide subjective data on taste, texture, appeal, and the like. If a product passes all stages, its process is sent out to the production facilities.

The facility tour conducted covered all four lab areas and the pilot plant, as well as the solvent house. The solvent house is a separate building where both waste and hazardous raw materials are stored. There were three drums of waste and some lab pack chemicals in storage. All containers were in good <sup>condition</sup> and properly labeled and dated. There was a fire alarm pull box inside the door that will sound a special tone and light up a panel in a guard room that will identify the problem.

-5-

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS (continued):

as being in the solvent house, in case a problem arises during the handling of hazardous waste. The storage area has a containment tank hooked to it by means of a floor drain system, in case a spill should occur.

The pilot plant has a deodorizer that removes smells from different vegetable and fish oils. This produces a non-contact cooling water from the compressors. This water, as well as lab sink, and pilot plant drains, is discharged to the sewer under permit No. JV 7040 with the Joint Meeting of Essex and Union Counties Sewerage authority.

The documentation review was conducted. 9 manifests were reviewed and found to be in good order, including land ban notification. All other documentation was also in good order. Letters had been sent to the local hospital, and to the local fire dept. on 3/3/87, to satisfy their requirement. The fire equipment had been tested, for 1988, by Walter H. Kilde. The contingency plan and personnel

-A#6

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS (continued):

Training documentation was also in good order.

No violations were found and no problems discovered.

The facility is in compliance with the Land ban notification requirements & (for solvents) and the California list (waste with pH of less than 2, and waste containing HOC's)

The Facility was delisted to generator only status in February 1988

-B-

Describe the activities that result in the generation of hazardous waste.

Solvent extractions and acid digestions of food products.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

2 X 55 gal drums Solvents - F003/D001  
1 X 55 gal drum D002  
approx 7 gal. misc. lab pack chemicals



## GENERAL

GENERAL CHECKLISTYES NO N/A

7:26-7.4(a)1

Does the Generator have an EPA ID number?

✓ — —

## HAZARDOUS WASTE DETERMINATION

7:26-8.5(a)

Did the generator test its waste to determine whether it is hazardous?

— ✓ —

7:26-8.5(b)

Did the generator determine the hazardous characteristics based upon knowledge of process?

✓ — —

Is the waste hazardous?

✓ — —

7:26-8.5(d)

Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?

✓ — —

## MANIFESTS

7:26-7.4(a)4

Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).

✓ — —

7:26-7.4(a)4i

The generator's name, address and phone number.

✓ — —

7:26-7.4(a)4ii

The generator's EPA ID number.

✓ — —

7:26-7.4(a)4iii

The hauler(s) name, address phone number and NJ registration.

✓ — —

7:26-7.4(a)4iv

The hauler(s) EPA ID number.

✓ — —

7:26-7.4(a)4v

The name, address and phone number of the designated TSD facility.

✓ — —

7:26-7.4(a)4vi

The TSF's EPA ID number.

✓ — —

7:26-7.4(a)4v

The name, address and phone number of the designated TSD facility.

✓ — —

7:26-7.4(a)4vii

The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?

✓ — —

7:26-7.4(a)4viii

Special handling instructions and any other information required on the form to be shipped by generator?

✓ — —

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)1x	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5i	Sign the manifest certification by hand?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility ) of all manifests for waste shipped off site more than 35 days ago?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

7:26-9.3

Accumulation Time

How is waste accumulated on site?

- ☒ Containers
- ☐ Tanks (greater than 90 days)  
(complete HWMF (TSD) Facility Checklist)
- ☐ Tanks (less than 90 days)
- ☐ Above ground
- ☐ Below ground
- ☐ Surface impoundments  
(complete HWMF (TSD) Facility Checklist)
- ☐ Piles (complete HWMF checklist)

7:26-9.3(a)1

Is waste accumulated for more than  
90 days?YES NO N/A

\_\_\_\_\_ ✓ \_\_\_\_\_

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS  
FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

<u>Containers</u>	<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone).		
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?		
7:26-9.4(d)41	Are all containers securely closed except those in use?		
7:26-9.4(d)41i1	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?		
7:26-9.4(d)41v	Are containerized hazardous wastes segregated in storage by waste type?		
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?		
7:26-9.4(d)5	Is the container storage area inspected at least daily?		
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?		
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment?		
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?		

55 gal drums  
+ lab packs  
2 x 55 gal - F003  
1 x 55 gal D001

YES NO N/A

7:26-7.2(b)

Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)

☒ ☐ ☐

Tanks (Less than 90 day storage)

7:26-9.3(b)

Does the generator accumulate hazardous waste on-site in an above ground tank?

☐ ☐ ☒

If yes, describe the tank(s):

- 1) Capacity \_\_\_\_\_
- 2) Shell thickness \_\_\_\_\_
- 3) Material Construction \_\_\_\_\_
- 4) Age of tank \_\_\_\_\_

7:26-9.3(b)

Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less?

☐ ☐ ☐

7:26-9.3(b)1

Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department?

☐ ☐ ☐

7:26-9.3(b)4

Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?

☐ ☐ ☐

7:26-9.3(b)5

Is each tank(s) rendered empty (1% or less remaining) every 90 days or less?

☐ ☐ ☐

7:26-9.3(b)6

Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility?

☐ ☐ ☐

7:26-9.3(b)8

If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is secondary containment provided for the below grade part?

☐ ☐ ☐

7:26-10.5(c)1

Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)?

☐ ☐ ☐

7:26-10.5(c)2

Does the generator use appropriate controls and practices to prevent overfilling?

☐ ☐ ☐

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-10.5(c)211	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?	—	—	—
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?	—	—	—
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?	—	—	—
7:26-10.5(d)11	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?	—	—	—
7:26-10.5(d)11	Does the containment system consist of material compatible with the wastes being stored?	—	—	—
7:26-10.5(d)111	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?	—	—	—
7:26-10.5(d)111	Is the tank protected from contact with accumulated liquids?	—	—	—
7:26-10.5(d)iv	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?	—	—	—
7:26-10.5(d)2	Is run-on into the containment area prevented?	—	—	—
	If not, explain.	—	—	—
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?	—	—	—
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?	—	—	—

YES NO N/A

7:26-10.5(d)41	If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter?	—	—	✓
7:26-9.4(g)4	<u>Personnel Training</u>			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	✓	—	—
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?	✓	—	—
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	✓	—	—
	Is there written documentation of the following:			
7:26-9.4(g)61	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	✓	—	—
7:26-9.4(g)611	A written job description for each position related to hazardous waste management?	✓	—	—
7:26-9.4(g)6111	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management?	✓	—	—
7:26-9.4(g)61v	Documentation of actual training or experience received by personnel?	✓	—	—
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	✓	—	—

YES NO N/A

7:26-9.6

Preparedness and prevention

Does the facility comply with preparedness and prevention requirements including maintaining:

7:26-96(b)1

An internal communications or alarm system?

✓ — —

7:26-9.6(b)2

A telephone or other device to summon emergency assistance from local authorities?

✓ — —

7:26-9.6(b)3

Portable fire equipment, spill control equipment, and decontamination equipment?

✓ — —

7:26-9.6(b)4

Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system?

✓ — —

7:26-9.6(c)

*walter kidd*

Is equipment tested and maintained?

✓ — —

7:26-9.6(d)1

Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?

✓ — —

7:26-9.6(e)

Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?

✓ — —

If no, please explain.

In your opinion, do the types of waste on site require all of the above procedures, or are some not required?

✓ — —

Explain.

7:26-9.6(f)

Has the facility made the following arrangements, as appropriate for the type waste handled on site:

— — —

7:26-9.6(f)1

Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes.

✓ — —



		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	—	—	✓
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment supplies?	✓	—	—
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility?	✓	—	—
7:26-9.6(f)5	Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually?	✓	—	—
7:26-9.6(f)6	If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record.	—	—	✓
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7?	✓	—	—
7:26-9.4(g)8i	If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement?	—	—	✓
7:26-9.4(g)8ii	Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements?	—	—	✓
	If yes, did the owner operator provide those specific local officials with written approval of the exemption?	—	—	✓

YES NO N/A

7:26-9.7

Contingency Plan and Emergency Procedures

7:26-9.7(a)

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water?

✓ \_ \_

7:26-9.7(b)

Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?

✓ \_ \_

7:26-9.7(c)

Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?

✓ \_ \_

7:26-9.7(d)

Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCP) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq.

\_ \_ ✓

If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?

\_ \_ ✓

7:26-9.7(e)

Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?

✓ \_ \_

YES NO N/A

7:26-9.7(f)

Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?

☒ \_ \_ \_

7:26-9.7(g)

Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?

☒ \_ \_ \_

7:26-9.7(h)

Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary route could be blocked by releases of hazardous waste or fires)?

☒ \_ \_ \_

7:26-9.7(i)

Is a copy of the contingency plan and all revisions to the plan:

1. Maintained at the facility;
2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?

☒ \_ \_ \_☒ \_ \_ \_

7:26-9.7(k)

Is there an employee on site or on call at all times with the responsibility of coordinating, all emergency response measures?

☒ \_ \_ \_

**RCRA LAND DISPOSAL RESTRICTION INSPECTION  
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
<b>A.</b>	<b><u>F-Solvent Wastes</u></b>					
1.	F001	_____	_____	_____	_____	_____
2.	F002	_____	_____	_____	_____	_____
3.	F003	_____✓_____	_____	_____	_____	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	_____	_____	_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified *NA*

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L *NA*

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 *✓*

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to *NA*

50 ppm _____	_____	_____	_____	_____
--------------	-------	-------	-------	-------

500 ppm _____	_____	_____	_____	_____
---------------	-------	-------	-------	-------

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_  
\_\_\_\_\_

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L *✓*

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

If yes, check the appropriate treatability group.

- \_\_\_\_ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
\_\_\_\_ Pharmaceutical wastewater containing spent methylene chloride  
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

\_\_\_\_ Yes      \_\_\_\_ No      ☒ NA

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

\_\_\_\_ Yes      \_\_\_\_ No      ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. Waste Analysis

## 1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes    ☐ No    ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes    ☐ No

If yes, note how this is adequate: 100% concentrations before use.

- TCLP

☐ Yes    ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes    ☐ No    ☐ NA

If yes, specify the waste stream: Solvent extraction waste

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes    ☒ No    ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Process doesn't change - all waste considered LDR

## 2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes    ☒ No    ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

What type of absorbent is used? \_\_\_\_\_  
Check the types of waste to which absorbent is added.

- \_\_\_\_ Liquid hazardous waste having a pH less than or equal to 2
- \_\_\_\_ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
- \_\_\_\_ Liquid hazardous waste containing metals
- \_\_\_\_ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

If yes, note how this is adequate: run analytical tests in labs on site - + knowledge of employees - MS in Chemistry

- Testing

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

If yes, list test method used: standard methods.

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

\_\_\_\_ Yes    \_\_\_\_ No    ☒ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_ Yes    \_\_\_\_ No    ☒ NA



C. Management

## 1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

\_\_\_\_\_ Yes    ☒ No

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes    \_\_\_\_\_ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes    \_\_\_\_\_ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)    ☒ Yes    \_\_\_\_\_ No

Applicable treatment standards    ☒ Yes    \_\_\_\_\_ No

Manifest number    ☒ Yes    \_\_\_\_\_ No

Waste analysis data, if available    ☒ Yes    \_\_\_\_\_ No

Identify off-site treatment or storage facilities: AETC.

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

\_\_\_\_\_ Yes    ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

\_\_\_\_\_ Yes    \_\_\_\_\_ No

## APPENDIX A

### SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes    ☐ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid  
nitrobenzene

☐ Yes ☐ No  
☐ Yes ☐ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene  
methyl ethyl ketone  
carbon disulfide  
isobutanol  
pyridine

☒ Yes ☐ No  
☐ Yes ☐ No  
☐ Yes ☐ No  
☐ Yes ☐ No  
☐ Yes ☐ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

☒ Yes ☐ No

If yes, list the constituents.

All

- (b) Are the constituents used for degreasing/cleaning?

☐ Yes ☒ No

If yes, list the constituents.

- (c) Are the constituents used as diluents?

☐ Yes ☒ No

If yes, list the constituents.

- (d) Are the constituents used as extractants?

☒ Yes ☐ No

If yes, list the constituents.

All

(e) Are the constituents used for fabric scouring?

Yes ☒ No

If yes, list the constituents.

(f) Are the constituents used as reaction and synthesis media?

Yes ☒ No

If yes, list the constituents.

All

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)

Yes ☐ No ☒

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

**APPENDIX B**  
**TREATMENT STANDARDS FOR F-SOLVENTS**

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

ENVIRONMENTAL PROTECTION  
AGENCY, REGION II  
NEW YORK, N.Y.

1987 JUN 30 AM 11: 53

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Howard B. Epstein, Esq.  
Levy, Bivona & Cohen  
10 East 40th Street  
New York, New York 10016

File  
NYD 065827925

Re: In the Matter of CPC International Best Foods Unit  
Docket No. II RCRA-85-0122

Dear Mr. Epstein:

Enclosed is a copy of the Consent Agreement and Final Order in the above-referenced proceeding, signed by the Deputy Regional Administrator for Region II of the United States Environmental Protection Agency.

Please note that payment is due within thirty (30) days of the date on which the Deputy Regional Administrator signed the enclosed Consent Agreement and Final Order. Please arrange for payment of this penalty according to the instructions given in the Consent Agreement.

Sincerely yours,

Stuart P. Deans  
Assistant Regional Counsel  
Waste and Toxic Substances Branch  
Office of Regional Counsel

Enclosure

cc: Gerard Burke, NJDEP

bcc: Bob Small, (WH-527)  
Laura Livingston, 2PM-PA ✓  
Ronald Gherardi, 2PM-FIN  
Hon. Gerald Harwood  
Nereida Sotomayor, RHC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

-----X  
In the Matter of :

CPC INTERNATIONAL BEST FOODS UNIT :  
Union, New Jersey 07083 :  
NJDO65827925 :

Respondent. :

Proceeding Under Section 3008 of :  
the Solid Waste Disposal Act, as :  
amended. :

CONSENT AGREEMENT

AND

CONSENT ORDER

Docket No. II RCRA-85-0122

-----X  
PRELIMINARY STATEMENT

This administrative proceeding was instituted pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act ("RCRA") and the Hazardous and Solid Waste Amendments of 1984 ("HSWA"), codified at 42 U.S.C. §§6901 et seq. ("The Act").

The Director of the Air and Waste Management Division of the U.S. Environmental Protection Agency ("EPA") Region II, Complainant in this proceeding, issued a Complaint, Compliance Order and Notice of Opportunity for Hearing to Respondent on September 30, 1985. Said document charged Respondent with certain violations of the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq., and the regulations promulgated thereunder, as follows:

1. Respondent operates a facility located at 1120 Commerce Avenue, Union, New Jersey 07083.

2. By notification dated August 18, 1980, Respondent informed EPA that it conducts activities at the facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6903(5) and in 40 CFR §261.3. By application dated November 17, 1980, Respondent requested a permit to conduct its hazardous waste activities.

3. New Jersey Administrative Code (N.J.A.C.) Title 7, Chapter 26, sets standards for hazardous waste treatment, storage and disposal facilities.

4. N.J.A.C. 7:26-9.8 requires the owner or operator of a hazardous waste treatment, storage or disposal facility to prepare and maintain at the facility a copy of a plan to close the facility in a manner that minimizes or eliminates the post-closure escape of hazardous waste or hazardous waste constituents. This section also sets forth the elements that must be included in a closure plan.

5. N.J.A.C. 7:26-9.10 requires the owner or operator of a hazardous waste facility to have a written estimate of the costs of closing the facility. This section also sets forth the elements that must be included in the cost estimate.

6. Section 3007 of the Act, 42 U.S.C. §6927, allows EPA to request certain information from parties that handle hazardous waste. On or about June 20, 1985, EPA requested that Respondent



submit a copy of the closure plan and cost estimate for review.

7. On or about June 21, 1985, Respondent submitted a copy of the closure plan and cost estimate to EPA. Based upon a review of the closure plan and cost estimate, EPA has determined that Respondent did not provide sufficient information to meet the requirements of N.J.A.C. 7:26-9.8 and 9. 10. EPA made a determination that Respondent was in violation of N.J.A.C. 7:26-9.8 and 7:26-9.10.

#### CONSENT AGREEMENT

Based on the foregoing, and pursuant to Section 3008 of the Act, and Section 22.18 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR 22.18, it is hereby agreed that Respondent shall hereafter comply with all relevant regulations promulgated pursuant to New Jersey law and the following terms:

1. For the purpose of this proceeding and in the interest of settling this matter expeditiously, Respondent (a) admits the jurisdictional allegations of the Complaint; (b) admits the factual statements contained in this Agreement; and (c) neither concedes nor contests the conclusions of law contained in the Complaint or this Agreement.

2. Respondent expressly waives the right to request a hearing on any issue contained in this Agreement.

3. Respondent consents to the issuance and terms of the Final Order hereinafter recited and to the assessment of the stated penalty set forth herein.

4. Respondent shall, by the effective date of the accompanying Order, submit to EPA a closure plan/cost estimate sufficient to meet the requirements of N.J.A.C. 7:26-9.8 and 9.10.

5. Respondent shall continue to maintain, amend and update the closure plan and cost estimate as required by N.J.A.C. 7:26-9.9 and 9.10.

6. Respondent shall, within 30 days after receipt of the fully executed Consent Agreement and Consent Order, file an Amended Part A which shall reduce the maximum amount of hazardous waste to be stored at the facility to 400 gallons.

Within sixty (60) days after receipt of a signed and executed copy of this Consent Agreement and Consent Order, Respondent shall pay, by cashier's or certified check, a civil penalty for the alleged violations herein cited in the amount of Three Thousand dollars (\$3,000.00), payable to the "Treasurer, United States of America." Such payment shall be remitted to the EPA - Region II, (Regional Hearing Clerk), P.O. Box 360188M, Pittsburgh, Pennsylvania, 15251. Failure to either remit such payment in full or to fully comply with the terms of this Agreement will

result in the referral of this matter to the United States Attorney for appropriate action. Furthermore, if payment is not received by the due date established herein, interest will be assessed on the overdue payment for each thirty (30) day period or portion thereof. The interest rate assessed will be based on the current value of funds to the U.S. Treasury at the time the Order is issued and will remain in effect until payment is received.

This Consent Agreement is being entered into by the parties in full settlement of all liabilities which might have attached as a result of the proceedings.

RESPONDENT:

BY:

Jack Abernethy  
For CEC INTERNATIONAL BEST FOODS  
UNIT

TITLE:

VP R & D

DATE:

6/23/86

COMPLAINANT:

BY:

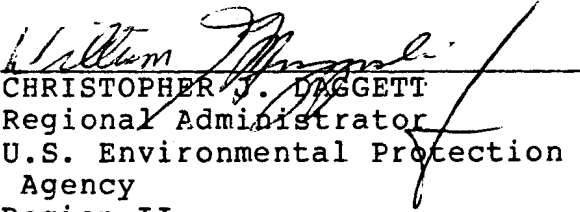
Conrad Simon  
CONRAD SIMON  
Director  
Air & Waste Management Division

DATE:

6/23/87

CONSENT ORDER

The Regional Administrator of EPA, Region II, concurs in the foregoing Consent Agreement. The Agreement entered into by the parties is hereby approved and incorporated herein. This Order is hereby issued effective immediately. So Ordered.

  
CHRISTOPHER J. DAGGETT  
Regional Administrator  
U.S. Environmental Protection  
Agency  
Region II  
26 Federal Plaza  
New York, New York 10278

DATE: \_\_\_\_\_

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log  
FEB 04 1988

*file*

State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Director  
401 East State St.  
CN 028  
Trenton, N.J. 08625  
609 - 633 - 1408

Keith J. Casey, Environmental Coordinator  
Best Foods Research & Engineering Center  
P.O. Box 1534  
1120 Commerce Avenue  
Union, NJ 07083-5088

Dear Mr. Casey:

RE: Hazardous Waste TSD Facility Classification and Permitting Requirements  
for Best Foods Research and Engineering Center, Union, Union County, EP  
ID NO. NJD 065 827 925

The Bureau of Hazardous Waste Engineering of the Division of Hazardous Waste Management has reviewed your letter of January 18, 1988 in which you requested reclassification of the subject facility from a hazardous waste treatment, storage or disposal (TSD) facility to a "generator only" status.

The RCRA Part A application filed with the USEPA on November 19, 1980 listed the subject Best Foods Plant as a TSD facility with only a hazardous waste storage in containers activity (S01) of 1,500 gallons.

On January 21, 1988, a site visit of the subject facility was conducted by Bob Patel of my staff who observed one (1) area, approximately 8' x 9', for storage of hazardous waste in containers. This area was located within a Solvent Storage Building and there were no visible cracks and no visible stains, spills or leaks on the surface of the concrete pad. Also, there were three (3) 55-gallon containers on storage pad with various accumulation start dates in excess of 90 days marked and properly labelled. The Bureau concludes that cleanup of the hazardous waste storage area is not required.

In order to reclassify the subject facility from a hazardous waste TSD facility to a generator, the facility must comply with N.J.A.C. 7:26-9.3(a), and the Bureau will have to process the change as a termination of TSD status, including a public notice and thirty (30) day public comment period on the change from TSD status to "generator only" status.

Additionally, your company should explain how it will arrange for removal of the hazardous waste containers in less than 90 day intervals, since the hazardous waste containers were in the past held in excess of 90 days as noted during the site visit of January 21, 1988.

FEB 04 1988

Since the Part B call-in date was December 30, 1987 and the company does not wish to maintain TSD status, Best Foods Research of Engineering Center must achieve compliance with the provisions of N.J.A.C. 7:26-9.3(a), "Accumulation of Hazardous Waste for 90 days or less", by March 30, 1988 (90 days after the date of the Part B call-in notice), which include the requirements:

1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
2. The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
3. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
4. The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

Finally, your company is hereby requested to provide, within thirty (30) days from the date of this letter, a plan for maintaining compliance with the requirements of N.J.A.C. 7:26-9.3(a). The Bureau will proceed with the issuance of the public notice of the proposed termination of TSD status for the subject facility after this plan has been reviewed.

If you have any questions on this matter, please contact Bob Patel of my staff at (609) 292-9880.

Very truly yours,



Ernest J. Kuhlwein, Jr., Chief  
Bureau of Hazardous Waste Engineering

EP9/slw

c: Barry Tornick, USEPA  
Tony Cavalier, MFO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

-----X  
: In the Matter of : COMPLAINT, COMPLIANCE ORDER,  
: : AND NOTICE OF OPPORTUNITY  
: : FOR HEARING  
: :  
CPC INTERNATIONAL - :  
BEST FOODS UNIT :  
UNION, NEW JERSEY 07083 :  
NJD065827925 :  
: Respondent. : Docket No. II RCRA-85-0122  
: :  
Proceeding Under Section 3008 :  
of the Resource Conservation and :  
Recovery Act :  
: :  
-----X

COMPLAINT

This administrative proceeding is instituted pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901 et seq.

Section 3006(b) of RCRA, 42 U.S.C. §6926(b), provides that the Administrator of the U.S. Environmental Protection Agency ("EPA") may, if certain criteria are met, authorize a State to operate a hazardous waste program in lieu of the federal program. The Administrator authorized the State of New Jersey to operate a program in lieu of the federal program on February 2, 1983. The State of New Jersey received final authorization to administer its hazardous waste program on February 21, 1985. Section 3008 of RCRA, 42 U.S.C. §6928, authorizes EPA to enforce the provisions of the authorized State program.

The Director of the Air and Waste Management Division of the EPA, Region II, Complainant in this proceeding, has determined that Respondent, CPC INTERNATIONAL - BEST FOODS UNIT, has violated the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E et seq., and the regulations promulgated thereunder, as hereinafter specified:

1. Respondent owns and operates a facility located at:

1120 Commerce Avenue  
Union, New Jersey 07083

2. By notification dated August 18, 1980, Respondent informed EPA that it conducts activities at the facility involving "hazardous waste," as that term is defined in Section 1004(5) of RCRA, 42 U.S.C. §6903(5) and in 40 CFR §261.3. By application dated November 17, 1980, Respondent requested a permit to conduct its hazardous waste activities.

3. New Jersey Administrative Code (N.J.A.C.) Title 7, Chapter 26, sets standards for hazardous waste treatment, storage and disposal facilities.

4. N.J.A.C. 7:26-9.8 requires the owner or operator of a hazardous waste treatment, storage or disposal facility to prepare and maintain at the facility a copy of a plan to close the facility in a manner that minimizes or eliminates the post-closure release of hazardous waste or waste constituents. This section also sets forth elements that must be included in a closure plan.

5. N.J.A.C. 7:26-9.10 requires that the owner or operator of a hazardous waste facility have a written estimate of the costs of closing the facility. This section also sets forth the elements that must be included in the cost estimate.

6. Section 3007 of RCRA, 42 U.S.C. §6927, allows EPA to request certain information from parties that handle hazardous waste. On or about June 20, 1985, EPA requested Respondent to submit a copy of the closure plan and cost estimate for review.

7. On or about June 21, 1985, Respondent submitted a copy of the closure plan/cost estimate to EPA. EPA's review of the closure plan/cost estimate established that Respondent did not provide sufficient information to meet the requirements of N.J.A.C. 7:26-9.8 and 9.10 respectively. The outstanding deficiencies and/or omissions are attached hereto (see Exhibit A). Therefore, Respondent is in violation of N.J.A.C. 7:26-9.8 and 7:26-9.10.

#### PROPOSED CIVIL PENALTY

In view of the above cited violations, and pursuant to the authority of Section 3008 of RCRA, Complainant herewith proposes the assessment of a civil penalty in the amount of seven thousand five hundred dollars (\$7,500.00) against Respondent for the violations specified hereinabove as follows:

- for the violation of N.J.A.C. 7:26-9.8	\$ 6,500.00
- for the violation of N.J.A.C. 7:26-9.10	1,000.00
	<hr/>
	\$ 7,500.00

#### COMPLIANCE ORDER

Based upon the foregoing, and pursuant to the authority of Section 3008 of RCRA, Complainant herewith issues the following Compliance Order against Respondent herein:

Respondent shall, within thirty (30) days of the effective date of this Compliance Order, submit a closure plan sufficient to meet the requirements of N.J.A.C. 7:26-9.8; and a cost estimate sufficient to meet the requirements of N.J.A.C. 7:26-9.10.



NOTICE OF LIABILITY FOR ADDITIONAL CIVIL PENALTIES

Pursuant to the terms of Section 3008(c) of RCRA, a violator failing to take corrective action within the time specified in a Final Compliance Order is liable for a civil penalty of up to \$25,000 for each day of continued noncompliance. Such continued noncompliance may also result in suspension or revocation of any permits issued to the violator pursuant to the authority of RCRA.

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

As provided in Section 3008(b) of RCRA, and in accordance with EPA's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, 45 Fed. Reg. 24363 (April 9, 1980) (a copy of which accompanies this Complaint, Compliance Order, and Notice of Opportunity for Hearing), you have the right to request a hearing to contest any material fact set out in the Complaint, or to contest the appropriateness of the proposed penalty, or the terms of the Compliance Order. (Consistent with the provisions of Section 3008(b) of RCRA, the hearing provided will be noticed and open to the general public, should you specifically request such a public hearing. In the absence of such a specific request, however, public notice of a scheduled hearing will not be published.)

To avoid being found in default, and having the proposed civil penalty assessed and the Compliance Order confirmed without further proceedings, you must file a written answer to the Complaint, which may include a request for a hearing. Your answer (if any) must be addressed to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York 10278, and must be filed within thirty (30) days of your receipt of this Complaint, Compliance Order, and Notice of Opportunity for Hearing. Your answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint, and should contain (1) a clear statement of the facts which constitute the grounds of your defense, and (2) a concise statement of the contentions which you intend to place in issue at the hearing.

The denial of any material fact, or the raising of any affirmative defense, will be construed as a request for a hearing. Failure to deny any of the factual allegations in the Complaint will be deemed to constitute an admission of the undenied allegations. Your failure to file a written answer within thirty (30) days of receipt of this instrument will be deemed to represent your admission of all facts alleged in the Complaint, and a waiver of your right to a formal hearing to contest any of the facts alleged by the Complainant. Your default will result in the final issuance of the Compliance Order, and assessment of the proposed civil penalty, without further proceedings.

INFORMAL SETTLEMENT CONFERENCE

Whether or not you request a hearing, the EPA encourages settlement of this proceeding consistent with the provisions of RCRA. At an informal conference with a representative of the Complainant you may comment on the charges and provide whatever additional information you feel is relevant to the disposition of this matter, including any actions you have taken to correct the violation, and any other special circumstances you care to raise. The Complainant has the authority to modify the amount of the proposed penalty, where appropriate, to

reflect any settlement agreement reached with you in such conference, or to recommend that any or all of the charges be dismissed, if the circumstances so warrant. Your request for an informal conference and other questions that you may have regarding this Complaint, Compliance Order, and Notice of Opportunity for Hearing should be directed to Mr. Stuart Deans, Attorney, Waste and Toxic Substances Branch, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York 10278, telephone (212) 264-5340.

Please note that a request for an informal settlement conference does not extend the thirty (30) day period during which a written answer and request for a hearing must be submitted. The informal conference procedure may be pursued as an alternative to or simultaneously with the adjudicatory hearing procedure. However, no penalty reduction will be made simply because such a conference is held. Any settlement which may be reached as a result of such conference will be embodied in a written Consent Agreement and Final Compliance Order to be issued by the Regional Administrator of EPA, Region II, and signed by you or your representative. Your signing of such Consent Agreement would constitute a waiver of your right to request a hearing on any matter stipulated to therein.

RESOLUTION OF THIS PROCEEDING WITHOUT HEARING OR CONFERENCE

Instead of filing an answer requesting a hearing or requesting an informal settlement conference, you may choose to comply with the terms of the Compliance Order, and to pay the proposed penalty. In that case, payment should be made by sending to the EPA - Region II, (Regional Hearing Clerk), P.O. Box 360188M, Pittsburgh, Pennsylvania 15251, a cashier's or certified check in the amount of the penalty specified in the "Proposed Civil Penalty" section of this instrument. Your check must be made payable to the Treasurer of the United States of America.

DATED:

COMPLAINANT:

*September 30, 1985*

  
CONRAD SIMON

Director

Air and Waste Management Division

Environmental Protection Agency

Region II

TO: Mr. Keith Casey  
Environmental Coordinator  
Best Foods Research &  
Engineering Center  
1120 Commerce Avenue  
Union, New Jersey 07083

cc: John H. Skoviak, Assistant Chief  
Compliance & Enforcement, NJDEP

Gerard Burke, Deputy Director  
Office of Regulatory Services, NJDEP

DCC: Sam Ezekwo, (2AWM-SW)  
Laura Livingston, (2OPM-PA) ✓  
Stan Siegel, (2AWM-SW)  
Stuart Deans, (2ORC-WIS)

CERTIFICATE OF SERVICE

This is to certify that on the ~~30<sup>th</sup>~~ day of September 1985, I served a true and correct copy of the foregoing Complaint by certified mail to Mr. Keith Casey, 1120 Commerce Avenue, Union, New Jersey 07083. I handcarried the original foregoing Complaint to the Regional Hearing Clerk.

Verna M. Casey

## EXHIBIT A

### CPC INTERNATIONAL - BEST FOODS UNIT EPA I.D. NO. NJD065827925

The following deficiencies and/or omissions have been noted in the Best Foods Unit's closure plan and cost estimate dated June 21, 1985.

#### Facility Condition

- Description of hazardous waste storage area including location, size and supporting surface material;
- Description of any discharge containment systems on-site;
- Milestone chart for final closure including dates for final generation of waste, completion of inventory, final decontamination of facility and completion of closure;
- Classification of hazardous waste including containerization and removal methods and amount of each type of waste;
- Estimate of the year of closure (use operating or economic life, if applicable);
- List of all auxiliary equipment required for waste/soil removal and decontamination processes;
- Certification of closure; and
- Description of security during closure.

#### Removing All Inventory/Waste

- Quantity of decontamination wastewater/solvent and residues;
- Estimate of the amount of contaminated soil; and
- Estimate of the maximum inventory of waste in containers.

#### Decontamination of Facility

- Area of the facility with potential soil contamination or justification for assuming no soil contamination exists (i.e., drum storage area, loading and unloading area, etc.);

- ° Methods and procedures for removing and disposing of contaminated soil, if applicable;
- ° Soil sample test locations, depths, analysis to be conducted and rationale for the selection of these parameters;
- ° Methods and procedures for decontamination of any auxiliary equipment;
- ° Procedures for decontamination of container storage area; and
- ° Methods for disposal of decontamination wastewater/solvent and residues.

#### Cost Estimate

Substantiation and itemization of closure cost estimate to ensure proper estimation. This estimate should include the following items which were omitted from the cost estimate submitted:

- Disposal of decontamination wastewater/solvent and residues
- Soil sampling, analysis and removal
- Professional engineer's certification
- Decontamination equipment, if required
- Decontamination or removal of all equipment including piping, auxiliary equipment, etc.
- Contingency cost
- Security cost
- Manpower: 1) Contractor cost, if applicable  
2) Administrative cost

ATTACHMENT 1

REASONING BEHIND PROPOSED PENALTY

Pursuant to 40 CFR §22.14(4) and (5), EPA is providing you this statement explaining the reasoning behind the proposed penalty assessed for each violation cited in this Complaint. Attached to this Complaint you will find the EPA Penalty Computation Worksheet ("worksheet") for each violation for which you have been assessed a proposed penalty. (Attachment 2.)

RCRA Section 3008(a)(3) states that the seriousness of the violation must be taken into account in assessing penalties. The seriousness of a violation is based on the potential for harm and extent of deviation from a statutory or regulatory requirement, which provide the basis for determining the gravity-based penalty.

EPA is providing you with a copy of the Penalty Assessment Matrix from which the Matrix Cell Range was selected (Attachment 3) as well as the following explanation of each entry on the worksheet:

1) For violation of N.J.A.C. 7:26-9.8.

- The "Potential for Harm" present in this violation was determined to be Moderate because of the fact that the adverse effect non-compliance has on the statutory or regulating purposes or procedures for implementing the RCRA program.

- The "Extent of Deviation" present in this violation was determined to be Moderate because of the fact that a closure plan was submitted but significant aspects of closure plan were omitted.

2) For violation of N.J.A.C. 7:26-9.10.

° The "Potential for Harm" present in this violation was determined to be Minor because of the fact that the adverse effect non-compliance has on the statutory or regulating purposes or procedures for implementing the RCRA program.

° The "Extent of Deviation" present in this violation was determined to be Moderate because of the fact that a closure cost estimate was submitted but a significant number of costly items were omitted.

The "Total Penalty Amount" of \$7,500.00 based on the above factors, was determined to be the appropriate penalty for Respondent's violation of N.J.A.C. 7:26-9.8 and 7:26-10.

## ATTACHMENT 2

### PENALTY COMPUTATION WORKSHEET

Company Name: Best Foods Research & Engineering Center

Regulation Violated: N.J.A.C. 7:26-9.8

Assessments for each violation should be determined on separate worksheets and totalled.

#### Part I - Seriousness of Violation Penalty

1. Potential for Harm:	<u>Moderate</u>
2. Extent of Deviation:	<u>Moderate</u>
3. Matrix Cell Range:	<u>\$7,999 - \$5,000</u>
Penalty Amount Chosen:	<u>\$6,500</u>
Justification for Penalty Amount Chosen:	No mention of the maximum unit of waste inventory at closure
4. Per-Day Assessment:	<u>\$6,500</u>

#### Part II - Penalty Adjustments

	<u>Percentage Change*</u>	<u>Dollar Amount</u>
1. Good faith efforts to comply/lack of good faith:	<u>Reserved</u>	<u>N/A</u>
2. Degree of willfulness and/or negligence:	<u>Reserved</u>	<u>N/A</u>
3. History of noncompliance:	<u>Reserved</u>	<u>N/A</u>
4. Other unique factors:	<u>Reserved</u>	<u>N/A</u>
5. Justification for Adjustments:		

\* Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.



PENALTY COMPUTATION WORKSHEET (Cont.)

6. Adjusted Per-Day Penalty (Line 4, Part I & Lines 1-4, Part II):	Reserved
7. Number of Days of Violation:	Reserved
8. Multi-day Penalty (Number of days x Line 6, Part II):	Reserved
9. Economic Benefit of Noncompliance:	Reserved
Justification:	
10. Total (Lines 8 & 9, Part II):	00
11. Ability to Pay Adjustment:	
Justification for Adjustment:	N/A
12. Total Penalty Amount (must not exceed \$25,000 per day of violation):	\$6,500

PENALTY COMPUTATION WORKSHEET

Company Name: Best Foods Research & Engineering Center

Regulation Violated: N.J.A.C. 7:26-9.10

Assessments for each violation should be determined on separate worksheets and totalled.

Part I - Seriousness of Violation Penalty

1. Potential for Harm:	<u>Minor</u>
2. Extent of Deviation:	<u>Moderate</u>
3. Matrix Cell Range:	<u>\$500 - \$1,499</u>
Penalty Amount Chosen:	<u>\$1,000</u>
Justification for Penalty Amount Chosen:	<u>Insufficient justification of cost.</u>
4. Per-Day Assessment:	<u>\$1,000</u>

Part II - Penalty Adjustments

	<u>Percentage Change*</u>	<u>Dollar Amount</u>
1. Good faith efforts to comply/lack of good faith:	<u>Reserved</u>	<u>N/A</u>
2. Degree of willfulness and/or negligence:	<u>Reserved</u>	<u>N/A</u>
3. History of noncompliance:	<u>Reserved</u>	<u>N/A</u>
4. Other unique factors:	<u>Reserved</u>	<u>N/A</u>
5. Justification for Adjustments:		

\* Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.

PENALTY COMPUTATION WORKSHEET (Cont.)

6. Adjusted Per-Day Penalty (Line 4, Part I & Lines 1-4, Part II):	Reserved
7. Number of Days of Violation:	Reserved
8. Multi-day Penalty (Number of days x Line 6, Part II):	Reserved
9. Economic Benefit of Noncompliance:	Reserved
Justification:	
10. Total (Lines 8 & 9, Part II):	00
11. Ability to Pay Adjustment:	
Justification for Adjustment:	N/A
12. Total Penalty Amount (must not exceed \$25,000 per day of violation):	\$1,000

## MATRIX

## Extent of Deviation from Requirement

	MAJOR	MODERATE	MINOR
MAJOR	\$25,000 to 20,000	\$19,999 to 15,000	\$14,999 to 11,000
MODERATE	\$10,999 to 8,000	\$7,999 to 5,000	\$4,999 to 3,000
MINOR	\$2,999 to 1,500	\$1,499 to 500	\$499 to 100

Potential  
for  
Harm

~~needs~~

X  
:  
: COMPLAINT, COMPLIANCE ORDER,  
: AND NOTICE OF OPPORTUNITY  
: FOR HEARING

Docket No. II RCRA-85-0122

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This administrative proceeding is instituted pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901 et seq.

Section 3006(b) of RCRA, 42 U.S.C. §6926(b), provides that the Administrator of the U.S. Environmental Protection Agency ("EPA") may, if certain criteria are met, authorize a State to operate a hazardous waste program in lieu of the federal program. The Administrator authorized the State of New Jersey to operate a program in lieu of the federal program on February 2, 1983. The State of New Jersey received final authorization to administer its hazardous waste program on February 21, 1985. Section 3008 of RCRA, 42 U.S.C. §6928, authorizes EPA to enforce the provisions of the authorized State program.

The Director of the Air and Waste Management Division of the EPA, Region II, Complainant in this proceeding, has determined that Respondent, CPC INTERNATIONAL - BEST FOODS UNIT, has violated the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E et seq., and the regulations promulgated thereunder, as hereinafter specified:

1. Respondent owns and operates a facility located at:

1120 Commerce Avenue  
Union, New Jersey 07083

2. By notification dated August 18, 1980, Respondent informed EPA that it conducts activities at the facility involving "hazardous waste," as that term is defined in Section 1004(5) of RCRA, 42 U.S.C. §6903(5) and in 40 CFR §261.3. By application dated November 17, 1980, Respondent requested a permit to conduct its hazardous waste activities.

3. New Jersey Administrative Code (N.J.A.C.) Title 7, Chapter 26, sets standards for hazardous waste treatment, storage and disposal facilities.

4. N.J.A.C. 7:26-9.8 requires the owner or operator of a hazardous waste treatment, storage or disposal facility to prepare and maintain at the facility a copy of a plan to close the facility in a manner that minimizes or eliminates the post-closure release of hazardous waste or waste constituents. This section also sets forth elements that must be included in a closure plan.

5. N.J.A.C. 7:26-9.10 requires that the owner or operator of a hazardous waste facility have a written estimate of the costs of closing the facility. This section also sets forth the elements that must be included in the cost estimate.

6. Section 3007 of RCRA, 42 U.S.C. §6927, allows EPA to request certain information from parties that handle hazardous waste. On or about June 20, 1985, EPA requested Respondent to submit a copy of the closure plan and cost estimate for review.

7. On or about June 21, 1985, Respondent submitted a copy of the closure plan/cost estimate to EPA. EPA's review of the closure plan/cost estimate established that Respondent did not provide sufficient information to meet the requirements of N.J.A.C. 7:26-9.8 and 9.10 respectively. The outstanding deficiencies and/or omissions are attached hereto (see Exhibit A). Therefore, Respondent is in violation of N.J.A.C. 7:26-9.8 and 7:26-9.10.

#### PROPOSED CIVIL PENALTY

In view of the above cited violations, and pursuant to the authority of Section 3008 of RCRA, Complainant herewith proposes the assessment of a civil penalty in the amount of seven thousand five hundred dollars (\$7,500.00) against Respondent for the violations specified hereinabove as follows:

- for the violation of N.J.A.C. 7:26-9.8	\$ 6,500.00
- for the violation of N.J.A.C. 7:26-9.10	1,000.00
	<hr/>
	\$ 7,500.00

#### COMPLIANCE ORDER

Based upon the foregoing, and pursuant to the authority of Section 3008 of RCRA, Complainant herewith issues the following Compliance Order against Respondent herein:

Respondent shall, within thirty (30) days of the effective date of this Compliance Order, submit a closure plan sufficient to meet the requirements of N.J.A.C. 7:26-9.8; and a cost estimate sufficient to meet the requirements of N.J.A.C. 7:26-9.10.

NOTICE OF LIABILITY FOR ADDITIONAL CIVIL PENALTIES

Pursuant to the terms of Section 3008(c) of RCRA, a violator failing to take corrective action within the time specified in a Final Compliance Order is liable for a civil penalty of up to \$25,000 for each day of continued noncompliance. Such continued noncompliance may also result in suspension or revocation of any permits issued to the violator pursuant to the authority of RCRA.

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

As provided in Section 3008(b) of RCRA, and in accordance with EPA's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, 45 Fed. Reg. 24363 (April 9, 1980) (a copy of which accompanies this Complaint, Compliance Order, and Notice of Opportunity for Hearing), you have the right to request a hearing to contest any material fact set out in the Complaint, or to contest the appropriateness of the proposed penalty, or the terms of the Compliance Order. (Consistent with the provisions of Section 3008(b) of RCRA, the hearing provided will be noticed and open to the general public, should you specifically request such a public hearing. In the absence of such a specific request, however, public notice of a scheduled hearing will not be published.)

To avoid being found in default, and having the proposed civil penalty assessed and the Compliance Order confirmed without further proceedings, you must file a written answer to the Complaint, which may include a request for a hearing. Your answer (if any) must be addressed to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York 10278, and must be filed within thirty (30) days of your receipt of this Complaint, Compliance Order, and Notice of Opportunity for Hearing. Your answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint, and should contain (1) a clear statement of the facts which constitute the grounds of your defense, and (2) a concise statement of the contentions which you intend to place in issue at the hearing.

The denial of any material fact, or the raising of any affirmative defense, will be construed as a request for a hearing. Failure to deny any of the factual allegations in the Complaint will be deemed to constitute an admission of the undenied allegations. Your failure to file a written answer within thirty (30) days of receipt of this instrument will be deemed to represent your admission of all facts alleged in the Complaint, and a waiver of your right to a formal hearing to contest any of the facts alleged by the Complainant. Your default will result in the final issuance of the Compliance Order, and assessment of the proposed civil penalty, without further proceedings.

INFORMAL SETTLEMENT CONFERENCE

Whether or not you request a hearing, the EPA encourages settlement of this proceeding consistent with the provisions of RCRA. At an informal conference with a representative of the Complainant you may comment on the charges and provide whatever additional information you feel is relevant to the disposition of this matter, including any actions you have taken to correct the violation, and any other special circumstances you care to raise. The Complainant has the authority to modify the amount of the proposed penalty, where appropriate, to

reflect any settlement agreement reached with you in such conference, or to recommend that any or all of the charges be dismissed, if the circumstances so warrant. Your request for an informal conference and other questions that you may have regarding this Complaint, Compliance Order, and Notice of Opportunity for Hearing should be directed to Mr. Stuart Deans, Attorney, Waste and Toxic Substances Branch, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York 10278, telephone (212) 264-5340.

Please note that a request for an informal settlement conference does not extend the thirty (30) day period during which a written answer and request for a hearing must be submitted. The informal conference procedure may be pursued as an alternative to or simultaneously with the adjudicatory hearing procedure. However, no penalty reduction will be made simply because such a conference is held. Any settlement which may be reached as a result of such conference will be embodied in a written Consent Agreement and Final Compliance Order to be issued by the Regional Administrator of EPA, Region II, and signed by you or your representative. Your signing of such Consent Agreement would constitute a waiver of your right to request a hearing on any matter stipulated to therein.

RESOLUTION OF THIS PROCEEDING WITHOUT HEARING OR CONFERENCE

Instead of filing an answer requesting a hearing or requesting an informal settlement conference, you may choose to comply with the terms of the Compliance Order, and to pay the proposed penalty. In that case, payment should be made by sending to the EPA - Region II, (Regional Hearing Clerk), P.O. Box 360188M, Pittsburgh, Pennsylvania 15251, a cashier's or certified check in the amount of the penalty specified in the "Proposed Civil Penalty" section of this instrument. Your check must be made payable to the Treasurer of the United States of America.

DATED:

COMPLAINANT:

*September 30, 1985*

  
CONRAD SIMON

Director  
Air and Waste Management Division  
Environmental Protection Agency  
Region II

TO: Mr. Keith Casey  
Environmental Coordinator  
Best Foods Research &  
Engineering Center  
1120 Commerce Avenue  
Union, New Jersey 07083

cc: John H. Skoviak, Assistant Chief  
Compliance & Enforcement, NJDEP

Gerard Burke, Deputy Director  
Office of Regulatory Services, NJDEP

bcc: Sam Ezekwo, (2AWM-SW)  
Laura Livingston, (2OPM-PA) ✓  
Stan Siegel, (2AWM-SW)  
Stuart Deans, (2ORC-WTS)



CERTIFICATE OF SERVICE

This is to certify that on the 30<sup>th</sup> day of September 1985, I served a true and correct copy of the foregoing Complaint by certified mail to Mr. Keith Casey, 1120 Commerce Avenue, Union, New Jersey 07083. I handcarried the original foregoing Complaint to the Regional Hearing Clerk.

Verna M. Casey

## EXHIBIT A

### CPC INTERNATIONAL - BEST FOODS UNIT EPA I.D. NO. NJD065827925

The following deficiencies and/or omissions have been noted in the Best Foods Unit's closure plan and cost estimate dated June 21, 1985.

#### Facility Condition

- ° Description of hazardous waste storage area including location, size and supporting surface material;
- ° Description of any discharge containment systems on-site;
- ° Milestone chart for final closure including dates for final generation of waste, completion of inventory, final decontamination of facility and completion of closure;
- ° Classification of hazardous waste including containerization and removal methods and amount of each type of waste;
- ° Estimate of the year of closure (use operating or economic life, if applicable);
- ° List of all auxiliary equipment required for waste/soil removal and decontamination processes;
- ° Certification of closure; and
- ° Description of security during closure.

#### Removing All Inventory/Waste

- ° Quantity of decontamination wastewater/solvent and residues;
- ° Estimate of the amount of contaminated soil; and
- ° Estimate of the maximum inventory of waste in containers.

#### Decontamination of Facility

- ° Area of the facility with potential soil contamination or justification for assuming no soil contamination exists (i.e., drum storage area, loading and unloading area, etc.);

- ° Methods and procedures for removing and disposing of contaminated soil, if applicable;
- ° Soil sample test locations, depths, analysis to be conducted and rationale for the selection of these parameters;
- ° Methods and procedures for decontamination of any auxiliary equipment;
- ° Procedures for decontamination of container storage area; and
- ° Methods for disposal of decontamination wastewater/solvent and residues.

#### Cost Estimate

- Substantiation and itemization of closure cost estimate to ensure proper estimation. This estimate should include the following items which were omitted from the cost estimate submitted:
  - Disposal of decontamination wastewater/solvent and residues
  - Soil sampling, analysis and removal
  - Professional engineer's certification
  - Decontamination equipment, if required
  - Decontamination or removal of all equipment including piping, auxiliary equipment, etc.
  - Contingency cost
  - Security cost
  - Manpower: 1) Contractor cost, if applicable  
2) Administrative cost

## ATTACHMENT 1

### REASONING BEHIND PROPOSED PENALTY

Pursuant to 40 CFR §22.14(4) and (5), EPA is providing you this statement explaining the reasoning behind the proposed penalty assessed for each violation cited in this Complaint. Attached to this Complaint you will find the EPA Penalty Computation Worksheet ("worksheet") for each violation for which you have been assessed a proposed penalty. (Attachment 2.)

RCRA Section 3008(a)(3) states that the seriousness of the violation must be taken into account in assessing penalties. The seriousness of a violation is based on the potential for harm and extent of deviation from a statutory or regulatory requirement, which provide the basis for determining the gravity-based penalty.

EPA is providing you with a copy of the Penalty Assessment Matrix from which the Matrix Cell Range was selected (Attachment 3) as well as the following explanation of each entry on the worksheet:

1) For violation of N.J.A.C. 7:26-9.8.

- The "Potential for Harm" present in this violation was determined to be Moderate because of the fact that the adverse effect non-compliance has on the statutory or regulating purposes or procedures for implementing the RCRA program.

- The "Extent of Deviation" present in this violation was determined to be Moderate because of the fact that a closure plan was submitted but significant aspects of closure plan were omitted.

2) For violation of N.J.A.C. 7:26-9.10.

° The "Potential for Harm" present in this violation was determined to be Minor because of the fact that the adverse effect non-compliance has on the statutory or regulating purposes or procedures for implementing the RCRA program.

° The "Extent of Deviation" present in this violation was determined to be Moderate because of the fact that a closure cost estimate was submitted but a significant number of costly items were omitted.

° The "Total Penalty Amount" of \$7,500.00 based on the above factors, was determined to be the appropriate penalty for Respondent's violation of N.J.A.C. 7:26-9.8 and 7:26-10.

# ATTACHMENT 2

## PENALTY COMPUTATION WORKSHEET

Company Name: Best Foods Research & Engineering Center

Regulation Violated: N.J.A.C. 7:26-9.8

Assessments for each violation should be determined on separate worksheets and totalled.

### Part I - Seriousness of Violation Penalty

1. Potential for Harm:	<u>Moderate</u>
2. Extent of Deviation:	<u>Moderate</u>
3. Matrix Cell Range:	<u>\$7,999 - \$5,000</u>
Penalty Amount Chosen:	<u>\$6,500.</u>
Justification for Penalty Amount Chosen:	No mention of the maximum unit of waste inventory at closure
4. Per-Day Assessment:	<u>\$6,500</u>

### Part II - Penalty Adjustments

	<u>Percentage Change*</u>	<u>Dollar Amount</u>
1. Good faith efforts to comply/lack of good faith:	<u>Reserved</u>	<u>N/A</u>
2. Degree of willfulness and/or negligence:	<u>Reserved</u>	<u>N/A</u>
3. History of noncompliance:	<u>Reserved</u>	<u>N/A</u>
4. Other unique factors:	<u>Reserved</u>	<u>N/A</u>
5. Justification for Adjustments:		

\* Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.

PENALTY COMPUTATION WORKSHEET (Cont.)

6. Adjusted Per-Day Penalty (Line 4, Part I & Lines 1-4, Part II):	Reserved
7. Number of Days of Violation:	Reserved
8. Multi-day Penalty (Number of days x Line 6, Part II):	Reserved
9. Economic Benefit of Noncompliance:	Reserved
Justification:	
10. Total (Lines 8 & 9, Part II):	00
11. Ability to Pay Adjustment:	
Justification for Adjustment:	N/A
12. Total Penalty Amount (must not exceed \$25,000 per day of violation):	\$6,500

PENALTY COMPUTATION WORKSHEET

Company Name: Best Foods Research & Engineering Center

Regulation Violated: N.J.A.C. 7:26-9.10

Assessments for each violation should be determined on separate worksheets and totalled.

Part I - Seriousness of Violation Penalty

1. Potential for Harm:	<u>Minor</u>
2. Extent of Deviation:	<u>Moderate</u>
3. Matrix Cell Range:	<u>\$500 - \$1,499</u>
Penalty Amount Chosen:	<u>\$1,000.</u>
Justification for Penalty Amount Chosen:	<u>Insufficient justification of cost.</u>
4. Per-Day Assessment:	<u>\$1,000</u>

Part II - Penalty Adjustments

	<u>Percentage Change*</u>	<u>Dollar Amount</u>
1. Good faith efforts to comply/lack of good faith:	<u>Reserved</u>	<u>N/A</u>
2. Degree of willfulness and/or negligence:	<u>Reserved</u>	<u>N/A</u>
3. History of noncompliance:	<u>Reserved</u>	<u>N/A</u>
4. Other unique factors:	<u>Reserved</u>	<u>N/A</u>
5. Justification for Adjustments:		

\* Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.



PENALTY COMPUTATION WORKSHEET (Cont.)

6. Adjusted Per-Day Penalty (Line 4, Part I & Lines 1-4, Part II):	Reserved
7. Number of Days of Violation:	Reserved
8. Multi-day Penalty (Number of days x Line 6, Part II):	Reserved
9. Economic Benefit of Noncompliance:	Reserved
Justification:	
10. Total (Lines 8 & 9, Part II):	00
11. Ability to Pay Adjustment:	
Justification for Adjustment:	N/A
12. Total Penalty Amount (must not exceed \$25,000 per day of violation):	\$1,000

## MATRIX

## Extent of Deviation from Requirement

	MAJOR	MODERATE	MINOR
MAJOR	\$25,000 to 20,000	\$19,999 to 15,000	\$14,999 to 11,000
MODERATE	\$10,999 to 8,000	\$7,999 to 5,000	\$4,999 to 3,000
MINOR	\$2,999 to 1,500	\$1,499 to 500	\$499 to 100

Potential  
for  
Harm

COST ESTIMATES FOR CLOSURE AND POST CLOSURE

FACILITY ID

N50065827925

NEW ENTRY

X

CHANGE ENTRY

-

DELETE ENTRY

-

CURRENT CLOSURE COST ESTIMATE

-----48300

CURRENT POST CLOSURE COST ESTIMATE

-----1

PRIOR CLOSURE COST ESTIMATE

-----

PRIOR POST CLOSURE COST ESTIMATE

-----

## INSTRUMENTS FOR ASSURANCE

FACILITY ID

NJ0065827925

NEW ENTRY

X

CODE

f

CHANGE ENTRY

-

SEQUENCE NO

--

DELETE ENTRY

-

AMOUNT COVERED CLOSURE

---48300

STATUS

A

AMOUNT COVERED POST CLOSURE

-----

MULTI FACILITY IND

X

CURRENT VALUE CLOSURE

-----

CURRENT VALUE POST CLOSURE

-----

FREE FIELD 1

-

DATE EFFECTIVE

820630

FREE FIELD 2

--

DATE EXPIRES

821231

FREE FIELD 3

---

PAYMENTS FOR CLOSURE

-----

TRUST FUND PAY-IN PERIOD

--

PAYMENTS FOR POST CLOSURE

-----

INSTRUMENT NO

-----

COMMENT TEXT (80 CHARACTERS MAXIMUM):

-----

## INSTRUMENTS FOR INSURANCE

FACILITY ID NJD065827925 CODE FMNEW ENTRY XSEQUENCE NO --CHANGE ENTRY -DELETE ENTRY -AMT PER OCCURRENCE FOR SUDDEN 1000000STATUS AANNUAL AMT FOR SUDDEN 2000000MULTI FACILITY IND XAMT PER OCCURRENCE FOR NONSUDDEN -----ANNUAL AMT FOR NONSUDDEN -----FREE FIELD -FREE FIELD --DATE EFFECTIVE 820630FREE FIELD ---DATE EXPIRES -----INSTRUMENT NO -----COMMENT TEXT (80 CHARACTERS MAXIMUM) :  
-----

# FINANCIAL PARTIES

NTD 65827926 ✓

NEW ENTRY ☒

CHANGE ENTRY ☐

DELETE ENTRY ☐

SEQUENCE NO --

NAME MAIN HURDOAN  
MAILING ADDRESS Park Avenue PLAZA 52 Street  
CITY NEW YORK  
STATE NY  
ZIP CODE 10055

# FINANCIAL PARTIES

NEW ENTRY ☐

CHANGE ENTRY ☐

DELETE ENTRY ☐

SEQUENCE NO --

NAME A  
MAILING ADDRESS A  
CITY A  
STATE A  
ZIP CODE A

HAZARDOUS WASTE FACILITY CERTIFICATE  
of  
LIABILITY INSURANCE

☒ Travelers Indemnity Company  
☐ Travelers Indemnity Company of America  
☐ The Phoenix Insurance Company

☐ Travelers Indemnity Company of Rhode Island  
☐ Travelers Indemnity Company of Illinois  
☐ Charter Oak Fire Insurance Company

One Tower Square  
Hartford, Connecticut 06115

hereby certifies that it has issued liability insurance covering bodily injury and property damage to

Name BEST FOODS RESEARCH CENTER

Mailing Address P O BOX 1534 1120 COMMERCE AVE  
UNION NJ 07083

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

E.P.A. I.D. NUMBER

NAME

ADDRESS

1. NJD 065827925

BEST FOODS RESEARCH CENTER

1120 COMMERCE AVE  
UNION NJ 07083

2.

for:

- ☒ sudden accidental occurrences  
☐ non-sudden accidental occurrences  
☐ sudden and non-sudden accidental occurrences

The limits of liability are \$ 1,000,000 each occurrence  
\$ 2,000,000 annual aggregate

exclusive of legal defense costs. The coverage is provided under

Policy Number T-SLG-181T031-A-82

Issued on 07-07-82

The effective date of said policy is 07-01-82.

(CONTINUED ON REVERSE)

MRPLN-120  
07-08-82

CP - 2852

10001 NEW YORK, NEW YORK 10001  
ENVIRONMENTAL PROTECTION  
AGENCY  
JUL 15 12 03 PM '82  
REGION II  
BRANCH  
GRANTS ADMINISTRATION

The Insurer further certifies the following with respect to the insurance described on Page 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after ~~a copy of such written notice~~ is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

John R. Kenney (DP)

John R. Kenney  
Secretary, Authorized Representative of The Travelers Insurance  
Companies  
One Tower Square, Hartford, Connecticut 06115





Park Avenue Plaza, 55 East 52nd Street, New York, NY 10055, Telephone: 212/909-5000

June 30, 1982

Ms. Jacqueline Schafer  
Regional Administrator  
U.S. Environmental Protection Agency  
26 Federal Plaza  
New York, New York 10007

Dear Ms. Schafer:

We have examined the consolidated balance sheet of CPC International Inc. and subsidiaries (the Company) as of December 31, 1981 and 1980, and the related consolidated statements of income and retained earnings and changes in financial position for each of the three years ended December 31, 1981 (the Financial Statements) and have issued our report thereon dated February 16, 1982. Our examination was made in accordance with generally accepted auditing standards and accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have reviewed the letter to the U.S. Environmental Protection Agency dated June 30, 1982 (the Letter) from Gene A. Burns, the Company's Chief Financial Officer, concerning the Company's use of the financial test to demonstrate responsibility for liability coverage and closure care as specified in Subpart H of 40 CFR Parts 264 and 265 for the Best Foods Research and Engineering Center, 1120 Commerce Avenue, Union, New Jersey 07083, and concerning the Company's use of the corporate guarantee to demonstrate financial responsibility for closure care for Penick Corporation and Amerchol Corporation.

We have compared the data which the Letter specifies as having been derived from the independently audited, year end financial statements for the latest completed fiscal year, ended December 31, 1981, to the Financial Statements referred to above and in connection with this procedure no matters came to our attention which caused us to believe that the specified data included in the Letter should be adjusted.

Very truly yours,

MAIN HURDMAN

CPC International Inc./ International Plaza Englewood Cliffs New Jersey 07632

G. A. BURNS

Senior Vice President &  
Chief Financial Officer

June 30, 1982

Ms. Jacqueline Schafer  
Regional Administrator  
U.S. Environmental Protection Agency  
26 Federal Plaza  
New York, New York 10007

Dear Ms. Schafer:

I am the chief financial officer of CPC International Inc., International Plaza, P. O. Box 8000, Englewood Cliffs, New Jersey 07632. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facility for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Best Foods Research and Engineering Center  
1120 Commerce Avenue  
Union, New Jersey 07083

EPA Identification No. NJD065827925

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

† Best Foods Research and Engineering Center  
1120 Commerce Avenue  
Union, New Jersey 07083

EPA Identification No. NJD065827925  
Storage Facility Closure Care Cost Estimate: \$48,300

G.A. BURNS

Senior Vice President &  
Chief Financial Officer

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2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

- † a. Penick Corporation  
540 New York Avenue  
Lyndhurst, New Jersey 07071

EPA Identification No. NJD081894842 ✓  
Closure Care Cost Estimate: \$127,000

- † b. Penick Corporation  
158 Mt. Olivet Avenue  
Newark, New Jersey 07114

EPA Identification No. NJT000604058 ✓  
Closure Care Cost Estimate: \$89,000

- c. Penick Corporation  
215 Watchung Avenue  
Orange, New Jersey 07050

EPA Identification No. NJD064266687 ✓  
Closure Care Cost Estimate: \$34,000

- d. Amerchol Corporation  
Talmadge Road  
P. O. Box 351  
Edison, New Jersey 08817

EPA Identification No. NJD053099974 ✓  
Closure Care Cost Estimate: \$104,000

G. A. BURNS

Senior Vice President &  
Chief Financial Officer

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3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

None

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

G. A. BURNS  
Vice President-Finance

-4-

Alternative 1

(Millions of Dollars)

1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above).....	\$ 0.4023
2.	Amount of annual aggregate liability coverage to be demonstrated.....	2.0
3.	Sum of lines 1 and 2.....	2.4023
*4.	Total liabilities (if any portion of the closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6).....	1,226.9
*5.	Tangible net worth.....	1,200.4
*6.	Net worth.....	1,235.1
*7.	Current assets.....	1,129.5
*8.	Current liabilities.....	706.4
9.	Net working capital (line 7 minus line 8).....	423.1
*10.	The sum of net income plus depreciation, depletion, and amortization.....	306.0
*11.	Total assets in U.S. (required only if less than 90% of assets are located in the U.S.).....	865.1

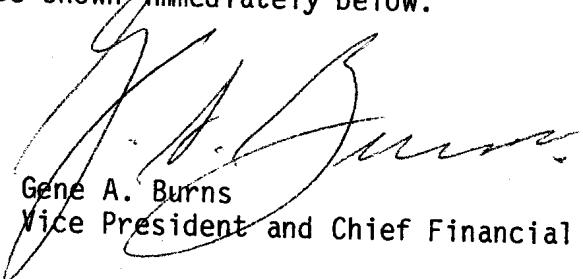
	Yes	No
12. Is line 5 at least \$10 million?.....	X	
13. Is line 5 at least 6 times line 3?.....	X	
14. Is line 9 at least 6 times line 3?.....	X	
*15. Are at least 90% of assets located in the U.S.? If not, complete line 16.....		X
16. Is line 11 at least 6 times line 3?.....	X	
17. Is line 4 divided by line 6 less than 2.0?.....	X	
18. Is line 10 divided by line 4 greater than 0.1?.....	X	
19. Is line 7 divided by line 8 greater than 1.5?.....	X	

CPC International Inc./ International Plaza Englewood Cliffs New Jersey 07632

G.A. BURNS  
Vice President-Finance

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I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.



Gene A. Burns  
Vice President and Chief Financial Officer

\_\_\_\_\_  
Date

SV/L18A11-15

G.A. BURNS  
Vice President-Finance

Corporate Guarantee For Closure or  
Post-Closure Care

Guarantee made this date, July 1, 1982, by CPC International Inc., a business corporation organized under the laws of the State of Delaware; herein referred to as guarantor, to the United States Environmental Protection Agency (EPA), obligee, on behalf of our subsidiary, Penick Corporation of 1050 Wall Street West, Lyndhurst, New Jersey 07071.

Recitals:

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).
2. Penick Corporation owns or operates the following hazardous waste management facilities covered by this guarantee:
  - a. Penick Corporation  
540 New York Avenue  
Lyndhurst, New Jersey 07071  
  
EPA Identification No. NJD081894842
  - b. Penick Corporation  
158 Mt. Olivet Avenue  
Newark, New Jersey 07114  
  
EPA Identification No. NJT000604058
  - c. Penick Corporation  
215 Watchung Avenue  
Orange, New Jersey 07050  
  
EPA Identification No. NJD064266687
3. "Closure plans" and post-closure plans" as used below refer to the plans maintained as required by Subpart G of 40 CFR Parts 264 and 265 for the closure and post-closure care of facilities as identified above.

Guarantee is for closure care for all facilities.

G. A. BURNS  
Vice President-Finance

-2-

4. For value received from Penick Corporation, guarantor guarantees to EPA that in the event that Penick Corporation fails to perform closure care of the above facilities in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Penick Corporation in the amount of the current closure or post-closure cost estimates as specified in Subpart H of 40 CFR Parts 264 and 265.
5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrator for the Region in which the facilities are located and to Penick Corporation that he intends to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Penick Corporation. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless Penick Corporation has done so.
6. The guarantor agrees to notify the EPA Regional Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.
7. Guarantor agrees that within 30 days after being notified by an EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Penick Corporation unless Penick Corporation has done so.
8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.



G.A. BURNS  
Vice President-Finance

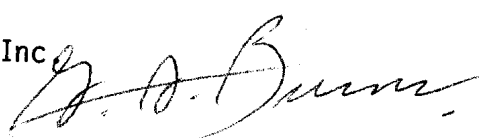
-3-

9. Guarantor agrees to remain bound under this guarantee for so long as Penick Corporation must comply with the applicable financial assurance requirements of Subpart H or 40 CFR Parts 264 and 265 for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by certified mail to the EPA Regional Administrator for the Region in which the facilities are located and to Penick Corporation, such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and Penick Corporation as evidenced by the return receipts.
10. Guarantor agrees that if Penick Corporation fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrator within 90 days after a notice of cancellation by the guarantor is received by an EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of Penick Corporation.
11. Guarantor expressly waives notice of acceptance of this guarantee by the EPA or by Penick Corporation. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permits.

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulations were constituted on the date first above written.


Effective date: July 1, 1982

Name of guarantor: CPC International Inc

Authorized signature for guarantor: 

Name of person signing: Gene A. Burns

Title of person signing: Vice President and Chief Financial Officer

Signature of witness or notary: 

G.A. BURNS  
Vice President-Finance

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5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrator for the Region in which the facilities are located.



CC

State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Director  
401 East State St.  
CN 028  
Trenton, N.J. 08625  
609 - 633 - 1408

DEC 30 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P-592 171 854

Keith J. Casey  
Section Leader  
Best Foods Res. and Eng. Center  
1120 Commerce Avenue  
Union, NJ 07083

Dear Mr. Casey:

RE: Best Foods Res. and Eng. Center, Union, EPA ID NO. NJD 065 827  
925

The Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) authorized the New Jersey Department of Environmental Protection (NJDEP) to establish a program requiring permits for hazardous waste treatment, storage or disposal facilities. NJDEP has issued regulations to implement this permit program, which can be found under N.J.A.C. 7:26-1.1 et seq.

Pursuant to these regulations, specifically N.J.A.C. 7:26-12.3, your facility has been operating as an existing facility since the New Jersey Hazardous Waste Management Regulations (N.J.A.C. 7:26-1.1 et seq.) became effective on October 8, 1981. Our records show that you have submitted either Part A of the USEPA RCRA Permit Application or Part A of the New Jersey Hazardous Waste Facility Permit Application. If necessary, your Part A application shall be revised to reflect the requirements of N.J.A.C. 7:26-1.1 et seq. Forms may be obtained from this office or U.S.E.P.A. Region II at (212) 264-9880.

This letter shall constitute an official request for the complete New Jersey Hazardous Waste Facility Permit Application, which shall include items set forth in Attachment I. Please note that Item 7 requires the submittal of information pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA). The State of New Jersey is not yet authorized to administer the provisions in HSWA, therefore the attached letter shall constitute EPA's request for the HSWA portion of the permit application. Your permit application should be prepared to both the HSWA and pre-HSWA requirements.

Your alternative information statement and affidavit should be submitted no later than three (3) months from the date of this letter. The remaining sections of your application should be submitted no later than six (6) months from the date of this letter. Failure to submit the required application by this date shall constitute grounds for termination of existing facility status pursuant to N.J.A.C. 7:26-12.3(f)2.

As stated above, your full application is not due until six (6) months from the date of this letter. However, I would encourage you to start work on it as early as possible because there is a significant amount of information to be submitted. Initially, all applicants shall submit three (3) copies of the application. Two copies shall be submitted to:

Ernest J. Kuhlwein, Acting Chief  
Bureau of Hazardous Waste Engineering  
Division of Hazardous Waste Management  
New Jersey Department of Environmental Protection  
401 East State Street, 5th Floor  
Trenton, NJ 08625

The remaining copy shall be submitted to:

Barry Tornick, Chief  
New Jersey/Caribbean Permit Section  
U.S. Environmental Protection Agency  
Region II (2AWM-SW)  
26 Federal Plaza  
New York, New York 10278

The Department will notify the applicant as to how many additional copies are needed for distribution to appropriate state and local authorities when it completes its initial evaluation of the application.

Should you wish to treat part of your application as confidential information, please refer to Attachment II, which outlines the procedures to be followed in making this claim.

I have taken the liberty of scheduling two (2) application conferences in order to assist you in preparing this application. These conferences have been scheduled for January 28, 1988 and February 29, 1988 at 10:00 am. These conferences will be held in the conference room, 401 East State Street, 5th floor, Trenton, New Jersey 08625. If it is determined that one or both of these conferences is unnecessary, please notify my office of the cancellation.



# Notification of Regulated Waste Activity

Date Received  
(For Official Use Only)

98 APR 23 AM 11:46

HAZARDOUS & SOLID WA

Installation's EPA ID Number (Mark X in the appropriate box)

☐ A. First Notification ☐ B. Subsequent Notification  
(Complete Item G)

Installation's EPA ID Number  
NJ D 065827925

II. Name of Installation (Include company and specific site name)

HANNAH CALDWELL SCHOOL

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1120 COMMERCE AVENUE

Street (continued)

City or Town

UNION

State ZIP Code

NJ 07083-

County Code County Name

UNION

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

SAME

City or Town

V. Installation Contact (Person to be contacted regarding)

Name (last)

DUNN

KAREN

M

Job Title

SCHOOL BUS ADM 908-851-6406

VI. Installation Contact Address (See Instructions)

A. Contact Address Location

☒ X

2369 MORRIS AVENUE

City or Town

UNION

NJ 07083-

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

UNION TOWNSHIP BD OF ED

Street, P.O. Box, or Route Number

2369 MORRIS AVENUE

City or Town

UNION

State ZIP Code

NJ 07083-

Phone Number (area code and number)

908-851-6406

PS and Type

Owner Type

PS and Type

Owner Type

PS and Type

Owner Type

UPS EXP

Call Howard Zimmerman (973) 425-8500, the School purchase the property per Howard 4/27/98 10:25

Change (Owner)

**VIII. Type of Regulated Waste Activity (Mark X in the Applicable Boxes: Refer to Instructions)**

Air Hazardous Waste Activity		Solid Hazardous Waste Activity	
<input type="checkbox"/> Generator (See Instructions) <input checked="" type="checkbox"/> A Greater than 4000 kg/mo (2200 lbs) <input type="checkbox"/> B 100 to 4000 kg/mo (220 - 2200 lbs) <input type="checkbox"/> C Less than 100 kg/mo (220 lbs) <input type="checkbox"/> 2 Transporter (Indicate Mode in boxes C-E below) <input type="checkbox"/> F Other (Specify) _____ <input type="checkbox"/> 3 Commercial Import/Export <input type="checkbox"/> Mode of Transportation <input type="checkbox"/> 4 Air <input type="checkbox"/> 5 Rail <input type="checkbox"/> 6 Highway <input type="checkbox"/> 7 Water <input type="checkbox"/> 8 Other (Specify) _____	<input type="checkbox"/> Receptor (See Instructions) <input type="checkbox"/> A Greater than 4000 kg/mo (2200 lbs) <input type="checkbox"/> B 100 to 4000 kg/mo (220 - 2200 lbs) <input type="checkbox"/> C Less than 100 kg/mo (220 lbs) <input type="checkbox"/> D Certain Air Pollution Control <input type="checkbox"/> E Other (Specify) _____ <input type="checkbox"/> F Other (Specify) _____ <input type="checkbox"/> 7 Air <input type="checkbox"/> 8 Rail <input type="checkbox"/> 9 Highway <input type="checkbox"/> 10 Water <input type="checkbox"/> 11 Other (Specify) _____	<input type="checkbox"/> 1 Specification Used (See Instructions) <input type="checkbox"/> 2 Generator Marketing (See Instructions) <input type="checkbox"/> 3 Shipment (See Instructions) <input type="checkbox"/> 4 Burner and Combustion (See Instructions) <input type="checkbox"/> 5 Type of Combustion (See Instructions) <input type="checkbox"/> 6 Fuel (See Instructions) <input type="checkbox"/> 7 Air <input type="checkbox"/> 8 Rail <input type="checkbox"/> 9 Highway <input type="checkbox"/> 10 Water <input type="checkbox"/> 11 Other (Specify) _____	<input type="checkbox"/> 12 Specification Used (See Instructions) <input type="checkbox"/> 13 Burner and Combustion (See Instructions) <input type="checkbox"/> 14 Type of Combustion (See Instructions) <input type="checkbox"/> 15 Fuel (See Instructions) <input type="checkbox"/> 16 Air <input type="checkbox"/> 17 Rail <input type="checkbox"/> 18 Highway <input type="checkbox"/> 19 Water <input type="checkbox"/> 20 Other (Specify) _____

## D. Description of regulated waste (Use additional sheets if needed)

**A. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1961	1962	1963	1964	1965	1966	1967	1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100	2101	2102	2103	2104	2105	2106	2107	2108	2109	2110	2111	2112	2113	2114	2115	2116	2117	2118	2119	2120	2121	2122	2123	2124	2125	2126	2127	2128	2129	2130	2131	2132	2133	2134	2135	2136	2137	2138	2139	2140	2141	2142	2143	2144	2145	2146	2147	2148	2149	2150	2151	2152	2153	2154	2155	2156	2157	2158	2159	2160	2161	2162	2163	2164	2165	2166	2167	2168	2169	2170	2171	2172	2173	2174	2175	2176	2177	2178	2179	2180	2181	2182	2183	2184	2185	2186	2187	2188	2189	2190	2191	2192	2193	2194	2195	2196	2197	2198	2199	2200	2201	2202	2203	2204	2205	2206	2207	2208	2209	2210	2211	2212	2213	2214	2215	2216	2217	2218	2219	2220	2221	2222	2223	2224	2225	2226	2227	2228	2229	2230	2231	2232	2233	2234	2235	2236	2237	2238	2239	2240	2241	2242	2243	2244	2245	2246	2247	2248	2249	2250	2251	2252	2253	2254	2255	2256	2257	2258	2259	2260	2261	2262	2263	2264	2265	2266	2267	2268	2269	2270	2271	2272	2273	2274	2275	2276	2277	2278	2279	2280	2281	2282	2283	2284	2285	2286	2287	2288	2289	2290	2291	2292	2293	2294	2295	2296	2297	2298	2299	2300	2301	2302	2303	2304	2305	2306	2307	2308	2309	2310	2311	2312	2313	2314	2315	2316	2317	2318	2319	2320	2321	2322	2323	2324	2325	2326	2327	2328	2329	2330	2331	2332	2333	2334	2335	2336	2337	2338	2339	2340	2341	2342	2343	2344	2345	2346	2347	2348	2349	2350	2351	2352	2353	2354	2355	2356	2357	2358	2359	2360	2361	2362	2363	2364	2365	2366	2367	2368	2369</
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**B. Listed Hazardous Wastes.** (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

[illegible]

**C. Other Wastes.** (State or other wastes requiring an I.D. number. See instructions.)

[illegible]

## X-Certification

**I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.**

**Signature**

Name and Official Title (type or print)

Date Signed \_\_\_\_\_

Karen M. Donn, SBus Admin

4-22-98

## XI: Comments

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**Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)**

G. A. BURNS  
Vice President-Finance

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Alternative 1

(Millions of Dollars)

1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above).....	\$ 0.4023
2.	Amount of annual aggregate liability coverage to be demonstrated.....	2.0
3.	Sum of lines 1 and 2.....	2.4023
*4.	Total liabilities (if any portion of the closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6).....	1,226.9
*5.	Tangible net worth.....	1,200.4
*6.	Net worth.....	1,235.1
*7.	Current assets.....	1,129.5
*8.	Current liabilities.....	706.4
9.	Net working capital (line 7 minus line 8).....	423.1
*10.	The sum of net income plus depreciation, depletion, and amortization.....	306.0
*11.	Total assets in U.S. (required only if less than 90% of assets are located in the U.S.).....	865.1

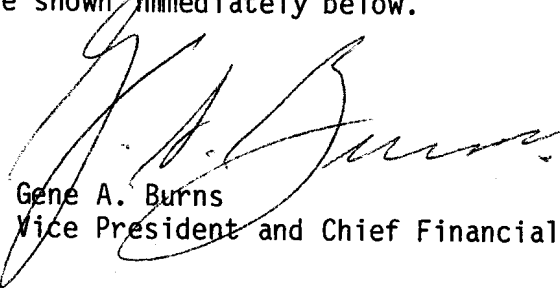
	Yes	No
12. Is line 5 at least \$10 million?.....	X	
13. Is line 5 at least 6 times line 3?.....	X	
14. Is line 9 at least 6 times line 3?.....	X	
*15. Are at least 90% of assets located in the U.S? If not, complete line 16.....		X
16. Is line 11 at least 6 times line 3?.....	X	
17. Is line 4 divided by line 6 less than 2.0?.....	X	
18. Is line 10 divided by line 4 greater than 0.1?.....	X	
19. Is line 7 divided by line 8 greater than 1.5?.....	X	

CPC International Inc./ International Plaza Englewood Cliffs New Jersey 07632

G. A. BURNS  
Vice President - Finance

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I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.



Gene A. Burns  
Vice President and Chief Financial Officer

\_\_\_\_\_  
Date

SV/L18A11-15

G.A. BURNS

Vice President-Finance

Corporate Guarantee For Closure or  
Post-Closure Care

Guarantee made this date, July 1, 1982, by CPC International Inc., a business corporation organized under the laws of the State of Delaware; herein referred to as guarantor, to the United States Environmental Protection Agency (EPA), obligee, on behalf of our subsidiary, Penick Corporation of 1050 Wall Street West, Lyndhurst, New Jersey 07071.

Recitals:

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).
2. Penick Corporation owns or operates the following hazardous waste management facilities covered by this guarantee:
  - a. Penick Corporation  
540 New York Avenue  
Lyndhurst, New Jersey 07071  
  
EPA Identification No. NJD081894842
  - b. Penick Corporation  
158 Mt. Olivet Avenue  
Newark, New Jersey 07114  
  
EPA Identification No. NJT000604058
  - c. Penick Corporation  
215 Watchung Avenue  
Orange, New Jersey 07050  
  
EPA Identification No. NJD064266687

Guarantee is for closure care for all facilities.

3. "Closure plans" and post-closure plans" as used below refer to the plans maintained as required by Subpart G of 40 CFR Parts 264 and 265 for the closure and post-closure care of facilities as identified above.



G.A. BURNS

Vice President-Finance

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4. For value received from Penick Corporation, guarantor guarantees to EPA that in the event that Penick Corporation fails to perform closure care of the above facilities in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Penick Corporation in the amount of the current closure or post-closure cost estimates as specified in Subpart H of 40 CFR Parts 264 and 265.
5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrator for the Region in which the facilities are located and to Penick Corporation that he intends to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Penick Corporation. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless Penick Corporation has done so.
6. The guarantor agrees to notify the EPA Regional Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.
7. Guarantor agrees that within 30 days after being notified by an EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Penick Corporation unless Penick Corporation has done so.
8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.

G. A. BURNS

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Vice President - Finance

9. Guarantor agrees to remain bound under this guarantee for so long as Penick Corporation must comply with the applicable financial assurance requirements of Subpart H or 40 CFR Parts 264 and 265 for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by certified mail to the EPA Regional Administrator for the Region in which the facilities are located and to Penick Corporation, such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and Penick Corporation as evidenced by the return receipts.
10. Guarantor agrees that if Penick Corporation fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrator within 90 days after a notice of cancellation by the guarantor is received by an EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of Penick Corporation.
11. Guarantor expressly waives notice of acceptance of this guarantee by the EPA or by Penick Corporation. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permits.

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulations were constituted on the date first above written.

Effective date: July 1, 1982

Name of guarantor: CPC International Inc.

Authorized signature for guarantor:

Name of person signing: Gene A. Burns

Title of person signing: Vice President and Chief Financial Officer

Signature of witness or notary:

G. A. BURNS

Vice President-Finance

Corporate Guarantee For Closure or  
Post-Closure Care

Guarantee made this date, July 1, 1982, by CPC International Inc., a business corporation organized under the laws of the State of Delaware; herein referred to as guarantor, to the United States Environmental Protection Agency (EPA), obligee, on behalf of our subsidiary, Amerchol Corporation of Talmadge Road, P. O. Box 351, Edison, New Jersey 08817.

Recitals:

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).
2. Amerchol Corporation owns or operates the following hazardous waste management facility covered by this guarantee:

Surface Impoundment  
EPA Identification No. NJD053099974  
Talmadge Road  
P. O. Box 351  
Edison, New Jersey 08817  
Guarantee is for closure care

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Subpart G of 40 CFR Parts 264 and 265 for the closure and post-closure care of facilities as identified above.
4. For value received from Amerchol Corporation, guarantor guarantees to EPA that in the event that Amerchol Corporation fails to perform closure care of the above facility in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Amerchol Corporation in the amount of the current closure or post-closure cost estimates as specified in Subpart H of 40 CFR Parts 264 and 265.

G. A. BURNS

Vice President - Finance

-2-

5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrator for the Region in which the facility is located and to Amerchol Corporation that he intends to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Amerchol Corporation. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless Amerchol Corporation has done so.
6. The guarantor agrees to notify the EPA Regional Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.
7. Guarantor agrees that within 30 days after being notified by an EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of Amerchol Corporation unless Amerchol Corporation has done so.
8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.
9. Guarantor agrees to remain bound under this guarantee for so long as Amerchol Corporation must comply with the applicable financial assurance requirements of Subpart H or 40 CFR Parts 264 and 265 for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by certified mail to the EPA Regional Administrator for the Region in which the facility is located and to Amerchol Corporation, such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and Amerchol Corporation as evidenced by the return receipts.

G. A. BURNS  
Vice President-Finance

-3-

10. Guarantor agrees that if Amerchol Corporation fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrator within 90 days after a notice of cancellation by the guarantor is received by an EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of Amerchol Corporation.
11. Guarantor expressly waives notice of acceptance of this guarantee by the EPA or by Amerchol Corporation. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permit.

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulations were constituted on the date first above written.

Effective date: July 1, 1982

Name of guarantor: CPC International Inc.

Authorized signature for guarantor:

Name of person signing: Gene A. Burns

Title of person signing: Vice President and Chief Financial Officer

Signature of witness or notary:



CC

18

✓ DEC 30 1987

State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Director  
401 East State St.  
CN 028  
Trenton, N.J. 08625  
609-633-1408

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P-592 171 854

Keith J. Casey  
Section Leader  
Best Foods Res. and Eng. Center  
1120 Commerce Avenue  
Union, NJ 07083

Dear Mr. Casey:

RE: Best Foods Res. and Eng. Center, Union, EPA ID NO. NJD 065 827  
925

The Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) authorized the New Jersey Department of Environmental Protection (NJDEP) to establish a program requiring permits for hazardous waste treatment, storage or disposal facilities. NJDEP has issued regulations to implement this permit program, which can be found under N.J.A.C. 7:26-1.1 et seq.

Pursuant to these regulations, specifically N.J.A.C. 7:26-12.3, your facility has been operating as an existing facility since the New Jersey Hazardous Waste Management Regulations (N.J.A.C. 7:26-1.1 et seq.) became effective on October 8, 1981. Our records show that you have submitted either Part A of the USEPA RCRA Permit Application or Part A of the New Jersey Hazardous Waste Facility Permit Application. If necessary, your Part A application shall be revised to reflect the requirements of N.J.A.C. 7:26-1.1 et seq. Forms may be obtained from this office or U.S.E.P.A. Region II at (212) 264-9880.

This letter shall constitute an official request for the complete New Jersey Hazardous Waste Facility Permit Application, which shall include items set forth in Attachment I. Please note that Item 7 requires the submittal of information pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA). The State of New Jersey is not yet authorized to administer the provisions in HSWA, therefore the attached letter shall constitute EPA's request for the HSWA portion of the permit application. Your permit application should be prepared to both the HSWA and pre-HSWA requirements.

Your alternative information statement and affidavit should be submitted no later than three (3) months from the date of this letter. The remaining sections of your application should be submitted no later than six (6) months from the date of this letter. Failure to submit the required application by this date shall constitute grounds for termination of existing facility status pursuant to N.J.A.C. 7:26-12.3(f)2.

As stated above, your full application is not due until six (6) months from the date of this letter. However, I would encourage you to start work on it as early as possible because there is a significant amount of information to be submitted. Initially, all applicants shall submit three (3) copies of the application. Two copies shall be submitted to:

Ernest J. Kuhlwein, Acting Chief  
Bureau of Hazardous Waste Engineering  
Division of Hazardous Waste Management  
New Jersey Department of Environmental Protection  
401 East State Street, 5th Floor  
Trenton, NJ 08625

The remaining copy shall be submitted to:

Barry Tornick, Chief  
New Jersey/Caribbean Permit Section  
U.S. Environmental Protection Agency  
Region II (2AWM-SW)  
26 Federal Plaza  
New York, New York 10278

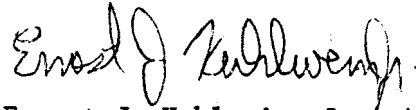
The Department will notify the applicant as to how many additional copies are needed for distribution to appropriate state and local authorities when it completes its initial evaluation of the application.

Should you wish to treat part of your application as confidential information, please refer to Attachment II, which outlines the procedures to be followed in making this claim.

I have taken the liberty of scheduling two (2) application conferences in order to assist you in preparing this application. These conferences have been scheduled for January 28, 1988 and February 29, 1988 at 10:00 am. These conferences will be held in the conference room, 401 East State Street, 5th floor, Trenton, New Jersey 08625. If it is determined that one or both of these conferences is unnecessary, please notify my office of the cancellation.

Should you have any questions regarding this official request to submit your Hazardous Waste Facility Permit Application, please do not hesitate to contact Bob Patel or Tom Sherman of my staff at (609) 292-9880.

Very truly yours,

A handwritten signature in cursive script, reading "Ernest J. Kuhlwein, Jr.".

Ernest J. Kuhlwein, Jr., Acting Chief  
Bureau of Hazardous Waste Engineering

EP9/slw  
Attachments  
c: Barry Tornick, USEPA

DOCUMENT: BEST  
FOLDER: HWEMCB



**SEP 11 1985**

Mr. John H. Skoviak  
Assistant Chief  
Compliance & Enforcement  
Division of Waste Management  
New Jersey Department of  
Environmental Protection  
120 Route 156  
Yardville, New Jersey 08620

Re: Enforcement Action Review  
Closure Plans

Dear Mr. Skoviak:

Pursuant to our agreement, enclosed are copies of proposed enforcement actions the U.S. Environmental Protection Agency (EPA) will be taking against the following facilities in New Jersey:

<u>FACILITY</u>	<u>EPA I.D. NUMBER</u>
Sun Chemical Corporation	NJD002458842
Best Foods Research & Engineering Center	NJD065827925

If you have any comments, please respond within 15 days of your receipt of this letter or the action will proceed as proposed.

All comments should be directed to Mr. Samuel Ezekwo of my staff, at 212/264-6141.

Sincerely yours,

Stanley Siegel, Acting Chief  
New Jersey/Caribbean Compliance & Enforcement Section

Enclosure

bcc: Samuel Ezekwo,, SWB (w/o encl.)  
Laura Livingston, PAB (w/o encl.)



## ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

05/04/98

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER -> NJD065827925

FACILITY NAME -> UNION TWP BD OF ED HANNAH CALDWELL SCH

MAILING ADDRESS -> 1120 COMMERCE AVE  
UNION, NJ 07083

INSTALLATION ADDRESS -> 1120 COMMERCE AVE  
UNION, NJ 07083

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II  
290 BROADWAY  
NEW YORK, NEW YORK 10007-1866

ATTN: AIR & WASTE MANAGEMENT DIVISION, 22ND FL.  
HAZARDOUS & SOLID WASTE PROGRAMS BRANCH  
RCRA NOTIFICATIONS

TO: DUNN, KAREN  
SCHOOL BUS ADM  
UNION TWP BD OF ED HANNAH CALDWELL SCH  
2369 MORRIS AVE  
UNION, NJ 07083



# Notification of Regulated Waste Activity

Date Received  
(For Official Use Only)

98 APR 23 AM 11:46

HAZARDOUS & SOLID WASTE

Installation's EPA ID Number (Mark X in the appropriate box)

☐ A. First Notification ☐ B. Subsequent Notification  
(Complete Item G)

Installation's EPA ID Number

NJTD065827925

II. Name of Installation (Include company and specific site name)

HANNAH CALDWELL SCHOOL

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1120 COMMERCE AVENUE

Street (continued)

City or Town

UNION

State

ZIP Code

NJ 07083-

County Code

County Name

UNION

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

SAME

City or Town

V. Installation Contact Person to be contacted regarding

Name (last)

DUNN

KAREN

Job Title

SCHOOL BUS ADM 908-851-6406

VI. Installation Contact Address (See instructions)

A. Contact Address Location

B. Street

☐ A. ☒ B.

2369 MORRIS AVENUE

City or Town

UNION

NJ 07083-

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

UNION TOWNSHIP BD OF ED

Street or P.O. Box or Route Number

2369 MORRIS AVENUE

City or Town

UNION

NJ 07083-

Phone Number (area code and number)

908-851-6406

B. Building Type

C. Ownership Type

D. Hazardous Waste

E. Date Received

F. Date Changed

G. Date Closed

☒

☐

☐

☐

☐

☐

☐

☐

Call Howard Zimmerman (973) 425-8500, the School purchase the property per Howard 4/27/98 10:25

UPS EXP

Change / Owner

**VIII. Type of Regulated Waste Activity (Mark X in the appropriate boxes. Refer to instructions.)**

[illegible]

## D. Description of Regulated Waste: (Use additional sheet)

**A. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

[illegible]

**B. Listed Hazardous Wastes.** (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

[illegible]

**C. Other Wastes.** (State or other wastes requiring an I.D. number. See instructions.)

[illegible]

## X-Certification

**I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.**

**Signature**

Name and Official Title (type or print)

Date Signed \_\_\_\_\_

Karen M. Donn, 5 Bus Admin

4-22-98

## XI. Conclusion

**Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)**